

**Illinois Environmental Protection
Division of Land Pollution**



RCRA INSPECTION REPORT

USEPA # <u>████████████████████</u>		EPA # <u>0311620007</u>	
Facility Name: <u>HERITAGE ENVIRONMENTAL SERVICES</u>		Phone #: <u>(708) 739-1151</u>	
Street Address: <u>CANAL BANK ROAD, NE</u>		County: <u>COOK</u>	
City: <u>LEMONT</u>		State: <u>ILLINOIS</u>	Zip: <u>60439</u>
Region: <u>MAYWOOD</u>	Inspection Date: <u>██████████</u>		From: <u>9:00am</u> To: <u>12:00pm</u>
Weather: <u>60°</u>		RECEIVED <u>JUL 30 1993</u>	

TYPE OF FACILITY

Notified As: G, TR, T, S, WAF, OSF, SDF		Regulated As: G, TR, T, S, WAF, OSF, SDF	
LDF? <u>No</u>	HPV? <u>Np</u>	90-Day F/U Required?:	YES <u> </u> NO <u>✓</u>

TYPE OF INSPECTION

CEI: ✓ Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____
CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS ^{N/A}

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 8/19/80, from (Initial) or (subsequent) Notification.

Initial Part A Date: 1/12/81 Amended: 12/8/92

Part A Withdrawal requested: / / Approved by (US)(IL) EPA: / /

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/10/88 Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to - USEPA: ☒ or N 4/1/85
Illinois Attorney General: Y or ☒ / / County State's Attorney: Y or ☒ / /

ORDERS ISSUED

CACO: 4/1/85 CAFO: 9/26/85 Consent Decree: / /
Federal Court Order: / / State Court Order: / / PCB Order: / /

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report		
							19 92	19 91	19 90
SO1	YES	No	YES	No	YES	N/A	YES	YES	YES
SO2	YES	No	YES	No	YES	N/A	YES	YES	YES
TO1	YES	No	YES	No	YES	N/A	YES	YES	YES
TO4	YES	No	YES	No	No	N/A	No	No	No
RECEIVED									
- 8 APR 1993									
IEPA/DI BO									

OPERATOR

PERSON(S) INTERVIEWED

TITLE

PHONE #**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

PREPARED BY

AGENCY/TITLE**PHONE #**

SUMMARY OF APPARENT VIOLATIONS

[illegible]

Facility Name: HERITAGE ENVIRONMENTAL SERVICES
 USEPA #: IL D 0 8 5 3 4 9 2 6 4
 IEPA #: 0 3 1 1 6 2 0 0 0 7

WASTE DISPOSITION FORM

HAZARDOUS
WASTES

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 92	* 19 91	* 19 90					
HAZARDOUS WASTE FUEL	PRODUCED FROM IGNITABLE H.W. & N-H WASTE OIL	3-27-93 FCLP 2-23-93	FOU-5 DOO-43 VARIES	YES	YES	(G)	(G)	(G)	120,000 gallons	approx. 100,000 gal./month	3-27-93 (KS)	CONTINENTAL CEMENT IN HANNIBAL, MISSOURI FOR SECONDARY FUELS
WASTE PETROLEUM NAPHTHA	FROM TWO PARTS WASHERS	KNOWLEDGE OF WASTE	DOO1	YES	YES	(G)	(G)	(G)	NONE	approx. 150 gal./year	↓	BLENDED WITH H.W. FUEL ON SITE
WASTE FLAMMABLE SOLIDS	SPILL PADS; CONTAM'D SOIL FROM REMED.; STRAINER CLEANINGS FROM 2° FUEL BLEND'G	QA/QC inbound material FCLP 1-15-93	FOU-FOO5-DOO1	YES	YES	(G)	(G)	(G)	2,000 pounds	approx. 225,000 lbs./year	3-23-93 (Rollins-TX)	ROLLINS ENVIRONMENTAL IN BATON ROUGE, LOUISIANA FOR INCINERATION
LAB PACKS	FROM OFF-SITE CLEAN-UP PROJECTS	NO ANALYSIS INVENTORY SHEETS	VARIES	YES	YES	(G)	(G)	(G)	1,000 gal. 2,000 lbs.	approx. 20,000 gal. hp. treatment 40,000 lbs./yr. incineration	3-23-93 (ENUSCO)	TRADE WASTE INCINERATION IN SAUGER, ILLINOIS FOR INCINERATION
LISTED HAZARDOUS WATER	HAZARDOUS WASTE - WATER FROM OFF SITE	QA/QC (inbound) shipments	VARIES	YES	YES	(G)	(G)	(G)	MIXED WITH H.W. FUELS	approx. 5,000 gallons/6 months	3-27-93 (KS)	ADDED TO H.W. FUEL WHICH GOES TO OFF-SITE INCINERATION
WASTE RECEIVED FOR TEMPORARY STORAGE	INORGANIC H.W. NOT TREATED ON SITE	QA/QC Inbound shipments	VARIES	YES	YES	(G)	(G)	(G)	25,000 gallons	approx. 50,000 gal./year	3-19-93	HERITAGE ENV. SERVICES IN INDIANAPOLIS, INDIANA FOR TREATMENT
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				

* All "NO" responses must be explained in narrative.

WASTE DISPOSITION FORM

- HAZARDOUS
SITES

Facility Name: HERITAGE ENVIRONMENTAL SERVICES
USEPA #: IL D 0 8 5 3 4 9 2 6 4
IEPA #: 0 3 1 1 6 2 0 0 0 7

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			• On 8700-12	• On 3510-3	• 19 92	• 19 91	• 19 90					
WASTE SOLIDS	N-H TANK BOTTOMS; SOIL FROM CLEAN-UPS	QA/QC (Outbound) 3-17-93	NON-HAZ.	N/A	N/A	G	G	G	15 yds ³	approx. 600 yds ³ /yr.	3-26-93	CID LANDFILL in CALUMET CITY, ILLINOIS for DISPOSAL
WASTE OIL AND OIL/WATER MIXTURES	N-H WASTE OIL THAT CANNOT BE TREATED ON SITE	QA/QC (Outbound) 3-27-93	NON-HAZ.	N/A	N/A	G	G	G	21,000 gallons	approx. 1,000,000 gal./yr.	3-27-93	HERITAGE ENV. SERVICES in INDIANAPOLIS, INDIANA for TREATMENT
TREATMENT WATER	REACTION WATER FROM SEPARATION OF WASTE OIL & WATER	QA/QC (Outbound) 3-16-93	NON-HAZ.	N/A	N/A	G	G	G	23,000 gallons	approx. 750,000 gal./yr. (incl. Containment)	3-29-93	HES in INDIANAPOLIS, INDIANA for TREATMENT
CRUSHED DRUMS	EMPTY METAL DRUMS CRUSHED BY A HYDRAULIC COMPACTOR	NONE	NON-HAZ.	N/A	N/A	G	G	G	30 yds ³	approx. 800 yds ³ /yr.	3-27-93	OMNI SOURCE in FORT WAYNE, INDIANA for RECYCLING
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				

* All "NO" responses must be explained in narrative.

0311620007 - Cook County
Lemont/Heritage Environmental Services
ILD085349264

NARRATIVE

Heritage Environmental Services (HES) is currently operating three divisions at the Lemont facility. The first of these is the Treatment Plant which includes the storage and treatment of hazardous wastes. The second division is Petroleum Management, whereby HES picks up waste oil from off-site generators on a multi-stop permit. The transportation operations at HES are a part of the Petroleum Management division. The third division is Crystal Clean, a parts washer service that began operations in May 1992. Crystal Clean provides virgin solvent (mineral spirits) and parts washer units to its customers. The spent solvent, which is exempt from regulation as a solid waste, is returned to Heritage where it is stored on site in a dedicated tank (VRT-4). Once a month the solvent is shipped off site by tanker truck to Trumbull Asphalt for use in the manufacture of a roofing compound.

HES accepts industrial oils such as crankcase and lube oils, as well as coolants and lubricants from off-site generators. In the oil treatment process, on-spec waste oil fuel is shipped off site to several facilities such as Enjet/Gatx in Argo, Illinois and Apex Oil in Forest View, Illinois. Off-spec waste oil fuel is shipped to Inland Steel in Gary, Indiana. The residual water and the rag layer (oil/water) are shipped to HES in Indianapolis, Indiana for treatment. Any oil fuel which does not meet specifications is sent to HES in Indiana for treatment.

Low flash wastewaters are treated by de-watering or separating the phase layers. The fuel layer is sent to be burned as hazardous waste fuel if it has BTU value. The non-hazardous waste is shipped to HES in Indiana for treatment.

Inks, paints, and solvents are accepted at this facility for hazardous waste fuel blending. Hazardous waste fuel with acceptable BTU value is shipped to cement kilns such as Continental Cement in Hannibal, Missouri or to TWI in Sauget, Illinois for incineration. Residual sludge and strainer cleanings from this process are shipped to an off-site incinerator as hazardous waste.

HES also accepts drums of waste for temporary storage from off-site generators. These wastes are mainly corrosives, plating wastes and other inorganic wastes. These wastes, along with heavy hazardous waste fuels which cannot be treated on site, are shipped to HES in Indiana for treatment.

Lab packs are also accepted by HES from off-site generators. These materials are shipped off site for incineration or treatment after repackaging on site. Steel drums are unpacked and the contents placed in fiber drums prior to shipment off site for incineration. Solvents and fuel materials are bulked and put into supplemental fuels on site. Acids and caustics are bulked into drums and shipped to HES in Indiana for treatment. Other inorganic wastes are shipped directly to HES in Indiana for treatment. Pesticides, oxidizers and some other wastes are shipped directly to an off-site incinerator.

Steel drums are cleaned and crushed on site for eventual shipment off site as scrap metal. Plastic drums which are RCRA-empty are ground up on site and shipped to an off-site facility where the plastic grindings are put into asphalt.

The drum storage and processing building began operations in December 1991. This building is used for all types of container handling including: drum storage; repackaging incinerable solids; de-packing lab packs; high speed dispersion; and housing the drum processing unit and the aerosol can crusher. Material from household hazardous waste collections is handled in this building as well as any type of bulking material into drums.

The aerosol can crusher began operations in December 1992. This unit crushes aerosol cans and recovers the product from the cans. The recovered liquid products are blended into hazardous waste fuels on site. The propane and butane propellants are burned as pilot gas in the boiler on site. The boiler is exempt from BIF regulations because the propellants are fuels and not waste materials.

The drum processing unit is currently in a start-up phase. The unit is a totally enclosed system which is intended for use in fuel blending. Material is augured out of a drum and then conveyed to a dispersion tank. Here the material is circulated with liquid fuel and passed through intermediate and fine grinders. The result is a pumpable slurry. The drum processing unit is intended to replace the high speed dispersion unit which is currently in use.

Hazardous Wastes Generated

1. Hazardous Waste Fuel (F001-F005, K086, D00X)
 - produced from ignitable hazardous waste and non-hazardous waste oil
 - approximately 100,000 gallons are generated in a month
 - shipped to Continental Cement in Hannibal, Missouri (cement kilns) or to TWI in Sauget, Illinois (incineration)
 - 120,000 gallons were on site
2. Waste Petroleum Naphtha (D001)
 - from two parts washers
 - approximately 150 gallons are generated annually
 - blended into hazardous waste fuel on site
 - none currently on site
3. Waste Flammable Solids (D001, F001-F005)
 - used spill pads; contaminated soil from off-site remediation projects; strainer cleanings from secondary fuel blending
 - approximately 225,000 pounds are generated annually
 - shipped to Rollins in Baton Rouge, Louisiana, ENSCO in Eldorado, Arkansas, or TWI in Sauget, Illinois (incineration)
 - 2,000 pounds were on site
4. Lab Packs (various EPA waste code numbers)
 - waste accepted from off-site generators and not treated on site
 - approximately 20,000 gallons are generated annually for treatment and 40,000 pounds are generated annually for incineration
 - shipped to HES in Indianapolis, Indiana (treatment) or to TWI in Sauget, Illinois, ENSCO in Eldorado, Arkansas, or Rollins in Deer Park, Texas (incineration)
 - 1,000 gallons were on site for treatment and 2,000 pounds were on site for incineration
5. Listed Hazardous Water (various EPA waste code numbers)
 - hazardous wastewater accepted from off-site generators
 - approximately 5,000 gallons are generated every six months
 - blended with hazardous waste fuel on site and shipped to TWI in Sauget, Illinois (incineration)
 - volume mixed with hazardous waste fuels on site

6. Waste Received for Temporary Storage (various EPA waste code numbers)
 - inorganic hazardous waste not treated on site
 - approximately 50,000 gallons are generated annually
 - shipped to HES in Indianapolis, Indiana (treatment)
 - 25,000 gallons were on site

Non-Hazardous Wastes Generated

1. Waste Solids
 - non-hazardous tank bottoms; soil from off-site remediation projects
 - approximately 60 cubic yards are generated annually
 - shipped to CID Landfill in Calumet City, Illinois (disposal)
 - 15 cubic yards were on site
2. Waste Oil and Oil/Water Mixtures
 - non-hazardous waste oil which cannot be treated on site
 - approximately 1,000,000 gallons are generated annually
 - shipped to HES in Indianapolis, Indiana (treatment)
 - 21,000 gallons were on site
3. Treatment Water
 - reaction water from the separation of waste oil and water
 - approximately 750,000 gallons (including containment water) are generated annually
 - shipped to HES in Indianapolis, Indiana (treatment)
 - 23,000 gallons were on site
4. Crushed Drums
 - empty metal drums crushed by a hydraulic compactor on site
 - approximately 800 cubic yards are generated annually
 - shipped to Omni Source in Fort Wayne, Indiana (reclamation of steel)
 - 30 cubic yards were on site

Hazardous Waste Units

1. S01 - Container Storage
 - diked concrete storage pad
 - 12 locked semi-trailers
 - container storage/processing building

2. S02 - Tank Storage
 - tanks are located in a tank farm with a concrete floor and concrete walls
 - VRT 1 - VRT 4: initial vacuum receiving tanks
 - CB 1 - CB 4: cone bottom gravity separation tanks
 - SF 1 - SF 7: product storage tanks
3. T01 - Treatment in Tanks
 - heat treatment and chemical separation occur in tanks
 - tanks are located in a tank farm with a concrete floor and concrete walls
 - HT 2 - HT 5: heat treatment tanks
 - HT 1: recycled fuel oil
4. T04 - Treatment in Containers
 - not occurring at the time of this inspection

Notes

Two satellite accumulation areas were observed during this inspection. One area was near the aerosol can crusher unit. A drum is kept in this area to contain off-spec aerosol cans. The other area is near the drum processing unit where used spill pads, dirty rags and other bulky materials are placed in containers.

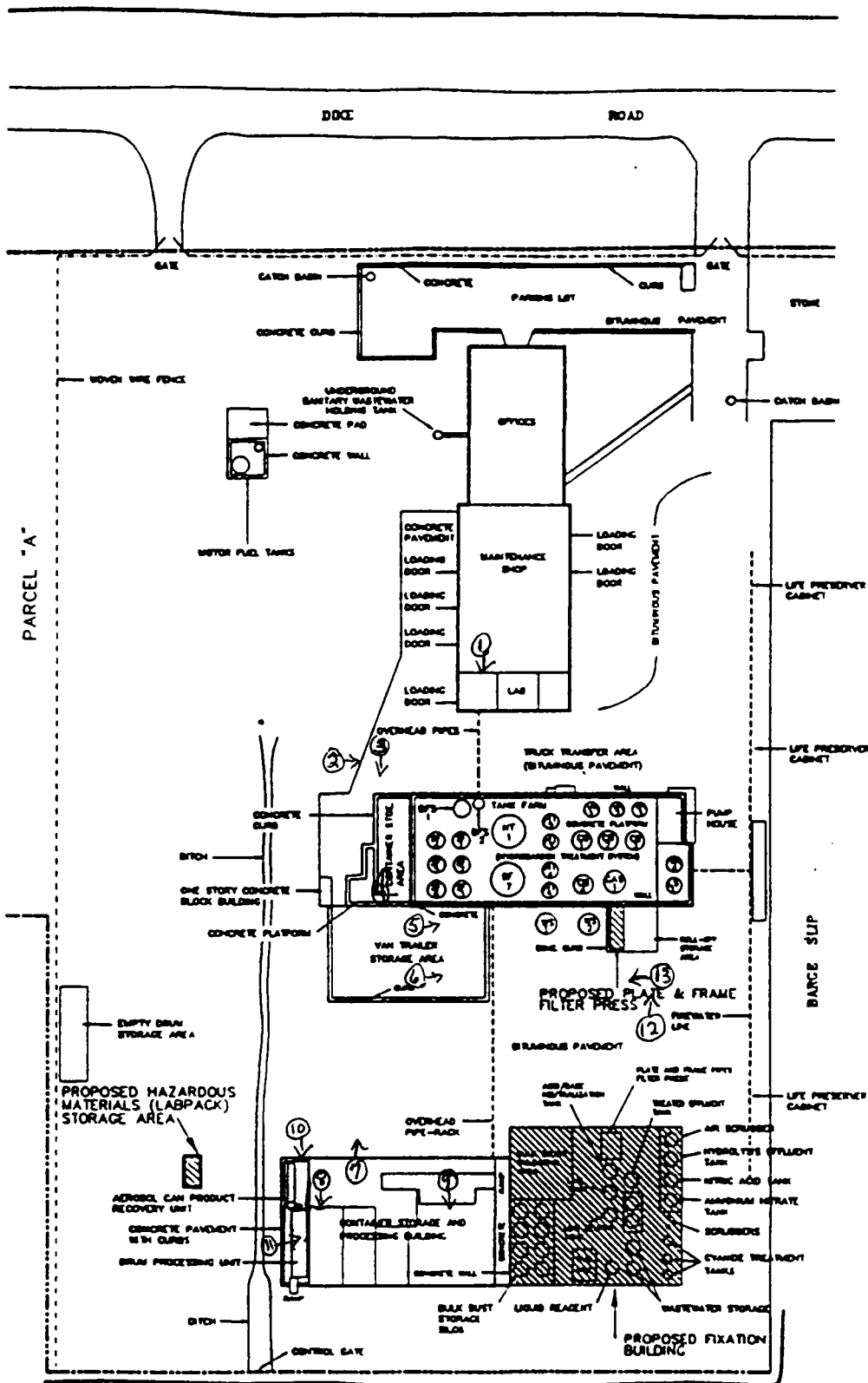
Fiber packs which contain hazardous wastes destined for incineration are accumulated for less than 90 days in a van trailer located on the north side of the drum storage building. These containers are held until an economical shipment is gathered and then shipped to Rollins in Louisiana for incineration.

Heritage Environmental Services is currently operating as a generator, transporter, treatment and storage facility, and marketer of hazardous waste fuels and spec and off-spec used oil fuels. At the time of this inspection this facility was apparently operating in compliance with the applicable RCRA regulations.

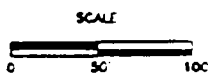
DC:dfa:pgb

DES PLAINES RIVER

NORTH



CHICAGO SANITARY AND SHIP CANAL



PROPOSED FACILITIES

HERITAGE ENVIRONMENTAL SERVICES, P.C.			
HERITAGE SERVICES			
PROPOSED FACILITIES			
HERITAGE REGENERATION/ENGINEERING, INC.			
DATE OF	APPROVED BY	DATE OF	APPROVED BY
FIGURE 1	APPROVED BY	DATE	APPROVED BY

HERITAGE ENVIRONMENTAL SERVICES

0311620007

ILD085349264

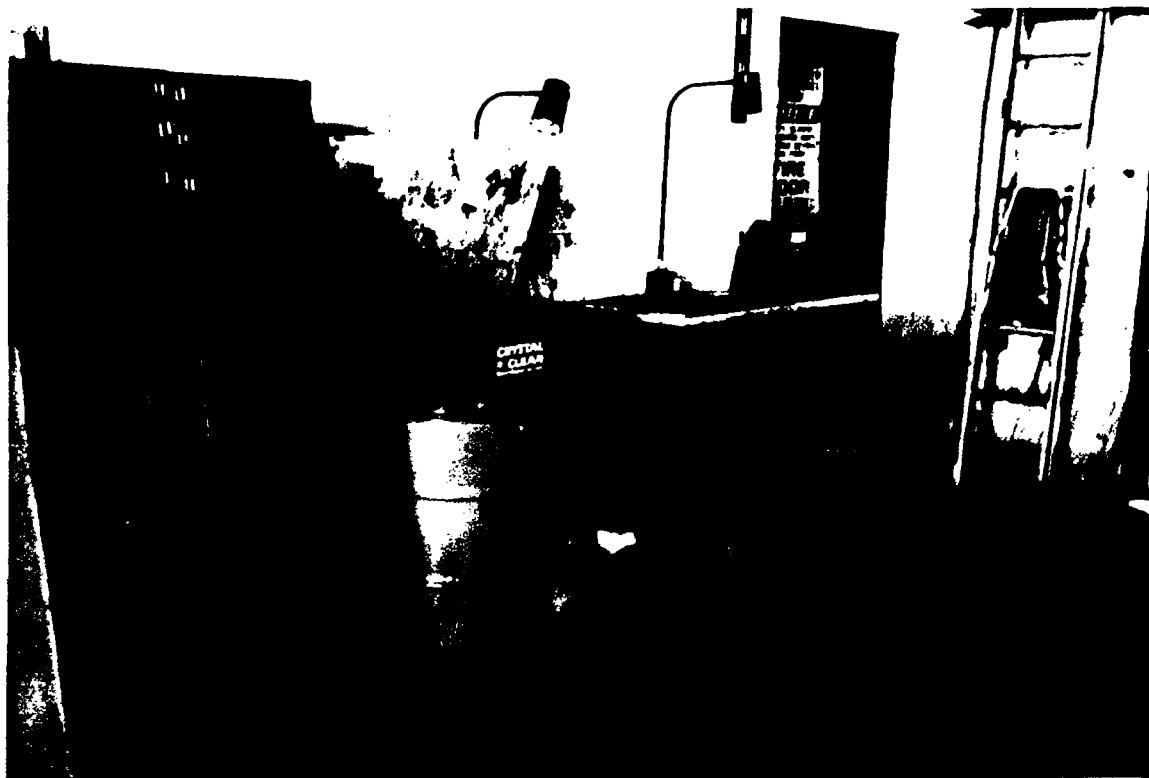
Site Name: Heritage Environmental Services

EPA #: 0311620007

Date: March 30, 1993

Time: 9:00am - 12:00pm

Photograph By: D. Czech



Comments: PARTS WASHERS IN MAINTENANCE AREA

Roll #: 93-247

Photo #: 1



Comments: FACING EAST: TRUCK TRANSFER AREA

Roll #: 93-247

Photo #: 2

Site Name: Heritage Environmental Services

: EPA #: 0311620007

Date: March 30, 1993

Time: 9:00am - 12:00pm

Photograph By: D. Czech



Comments: FACING SOUTH: CONTAINER STORAGE AREA, TANK FARM IS VISIBLE ON THE LEFT.

Roll #: 93-247

Photo #: 3



Comments: FACING NORTH: CONTAINER STORAGE AREA

Roll #: 93-247

Photo #: 4

site Name: Heritage Environmental Services

EPA #: 0311620007

Date: March 30, 1993

Time: 9:00am - 12:00pm

Photograph By: D. Czech



Comments: FACING EAST: VIEW INSIDE VAN TRAILER CONTAINING HAZARDOUS WASTE.

Roll #: 93-247

Photo #: 5



Comments: FACING EAST: VIEW INSIDE VAN TRAILER CONTAINING HAZARDOUS WASTE.

Roll #: 93-247

Photo #: 6

Site Name: Heritage Environmental Services

: EPA #: 0311620007

Date: March 30, 1993

Time: 9:00am - 12:00pm

Photograph By: D. Czech



Comments: FACING NORTH: VIEW INSIDE VAN TRAILER CONTAINING HAZARDOUS
WASTE ACCUMULATED FOR LESS THAN 90 DAYS. Roll #: 93-247 Photo #: 7



Comments: FACING SOUTH: FLAMMABLE STORAGE BAY IN THE CONTAINER STORAGE/
PROCESSING BUILDING Roll #: 93-247 Photo #: 8

Site Name: Heritage Environmental Services

: EPA #: 0311620007

Date: March 30, 1993

Time: 9:00am - 12:00pm

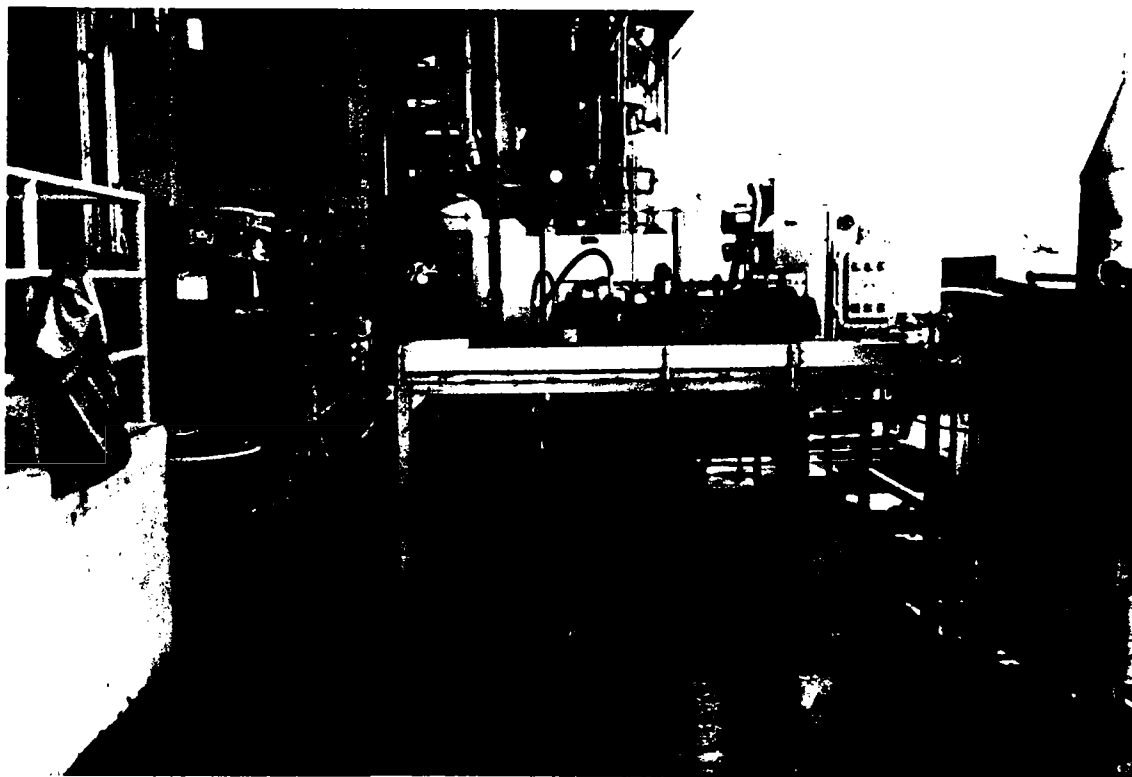
Photograph By: D. Czech



Comments: FACING SOUTH: NON-FLAMMABLE STORAGE BAYS IN CONTAINER STORAGE/
PROCESSING BUILDING

Roll #: 93-247

Photo #: 9



Comments: FACING SOUTH: AEROSOL CAN CRUSHING UNIT (FOREGROUND), SATELLITE
ACCUMULATION DRUM ON THE LEFT.

Roll #: 93-247

Photo #: 10

Site Name: Heritage Environmental Services

EPA #: 0311620007

Date: March 30, 1993

Time: 9:00am - 12:00pm

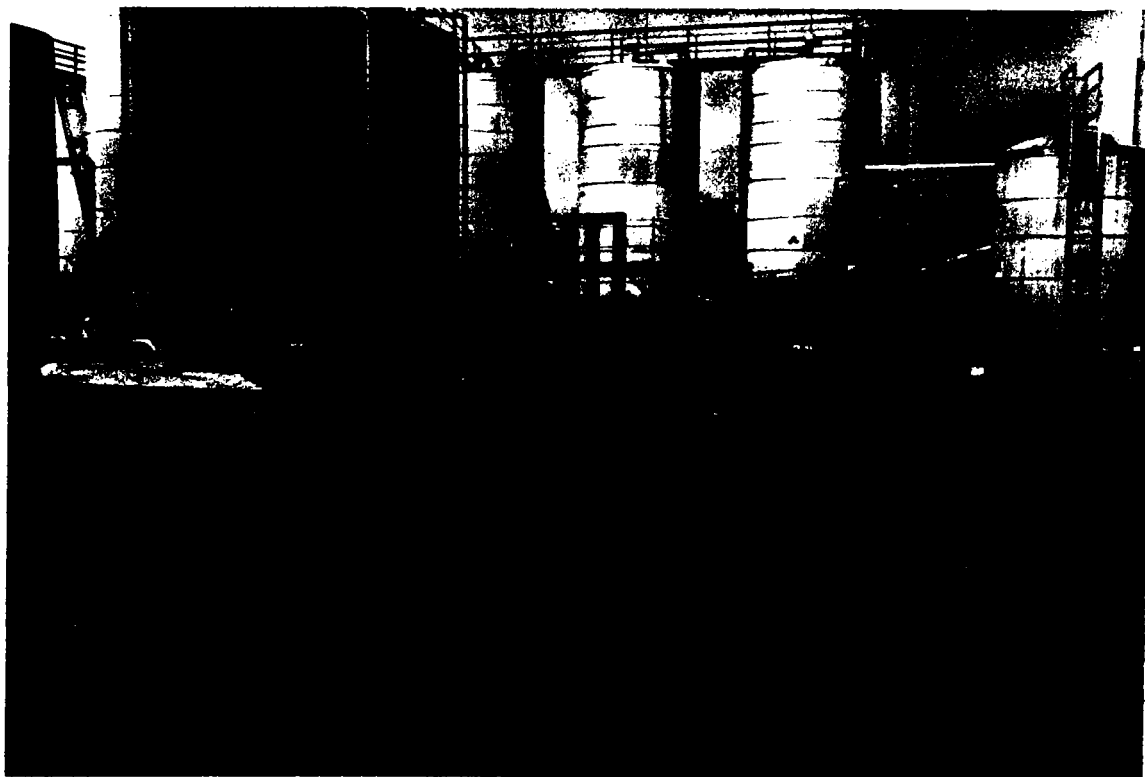
Photograph By: D. Czech



Comments: FACING EAST: SATELLITE ACCUMULATION AREA NEAR THE DRUM PROCESSING UNIT

Roll #: 93-247

Photo #: 11



Comments: FACING NORTH: ROLL-OFF BOXES CONTAINING NON-HAZARDOUS WASTES

Roll #: 93-247

Photo #: 12

Site Name: Heritage Environmental Services: EPA #: 0311620007Date: March 30, 1993Time: 9:00am - 12:00pmPhotograph By: D. CzechComments: FACING WEST: VAN TRAILER CONTAINER STORAGE AREARoll #: 93-247Photo #: 13

Comments: _____

Roll #: 93-247


Photo #: _____

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comments
					Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comments
			Ltr		Yes	No		
			Sub Sec					
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	✓			WASTE ALWAYS DELIVERED TO THE DESIGNATED FACILITY
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comments
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			INDIANA MISSOURI ARKANSAS LOUISIANA
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>NO SHIPMENTS BY WATER OR RAIL</p> 

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comments
			Sub Sec		Yes	No		
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				NO WASTE READY FOR TRANSPORTATION OFF SITE
OTH	1	X		Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____			✓	
				b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Turnment No
			Sub Sec		Yes	No		
OTH	1			Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.	✓			
OTH	1	X		Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	✓			FIBER PACKS DESTINED FOR INCINERATION ARE ACCUMULATED IN A TRAILER FOR LESS THAN 90 DAYS

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time	<input checked="" type="checkbox"/>			
				<p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or comment No
			Sub Sec		Yes	No		
				<p>Condition of Containers (Section 725.271)</p> <p>Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Compatibility of Waste with Container (Section 725.272)</p> <p>Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Management of Containers (Section 725.273)</p> <p>Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Inspections (Section 725.274)</p> <p>Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p>				

Area	Class	30 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Special Requirements for Ignitable or Reactive Wastes (Section 725.275)</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Special Requirements for Incompatible Wastes (Section 725.277)</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				


GEN-C-4

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				<p>SEE TSD CHECKLIST</p> 
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p>Maintenance and Operation of Facility (Section 725.131)</p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> - Air; - Soil; or - Surface Water, <p>which would threaten human health or the environment?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-14


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Complying with the requirements of: <ul style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				


GEN-C-26


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes _____ No _____</p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes _____ No _____</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes _____ No _____</p>				<p>NO EXCESS ACCUMULATION</p> 

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting	✓			
				Section 722.140: Recordkeeping				
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO REQUESTS FROM THE DIRECTOR


GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	✓			
MAN	1			Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			✓	NONE REQUIRED 

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p> <p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				 NONE REQUIRED
							✓		

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	NO EXPORTS OF HAZARDOUS WASTE 
				NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			<input checked="" type="checkbox"/>	NO IMPORTS OF HAZARDOUS WASTE 
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
			b2	Has the importer or his agent signed the manifest in place of the generator; and				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2	X		<p>PART 722 GENERATOR STANDARDS Subpart G: Farmers</p> <p>Section 722.170: Farmers</p> <p>Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:</p> <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>			✓	NO FARMING

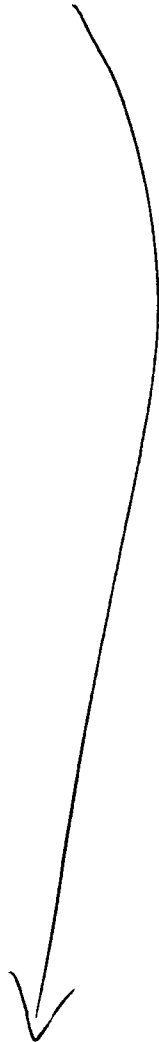
GEN-G-1



Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes _____ No <u>✓</u> Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes <u>✓</u> No _____ NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
OTH	1				Section 723.111: USEPA Identification Number a Has the transporter obtained a USEPA identification number?	✓			
OTH	1	X			Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: - For a period of 10 days or less? Yes _____ No <u>✓</u>	✓			

TR-A-1


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- Only in containers meeting the requirements of 35 III. Adm. Code 722.130, Packaging? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 III. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1/2			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping				✓ MANIFESTS FOR TRANSPORTATION ARE KEPT AT THE HES FACILITY IN INDIANAPOLIS, INDIANA 
				Section 723.120: The Manifest System				
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes ____ No ____				
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> - Signed and dated the accompanying manifests? Yes ____ No ____ - Returned a signed copy to the generator before leaving the generator's property? Yes ____ No ____ 				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes ____ No ____				
			d	Has the transporter who delivers hazardous waste to another transporter or to the designated facility:				


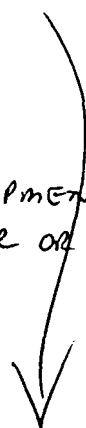
Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes ____ No ____ 2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes ____ No ____ 3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes ____ No ____				
			e	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ____				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes ____ No ____ N/A ____				
			g	Has the transporter who transports hazardous waste out of the United States:				
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes ____ No ____ 2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes ____ No ____ 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes ____ No ____ Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes ____ No <input checked="" type="checkbox"/> NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes ____ No ____ AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND				 Crystal Clean operation uses reclamation agreements (exempt waste) NDT RCRA-REGULATED 

TR-B-3


Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p>AND</p> <p>4) The date the waste is accepted? Yes ____ No ____</p> <p>AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes ____ No ____</p> <p>AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes ____ No ____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes ____ No ____</p> <p>OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes ____ No ____ N/A ____</p> <p>OR</p>				

TR-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			3) The next designated transporter? Yes ____ No ____ N/A ____ OR 4) The place outside the United States designated by the generator? Yes ____ No ____ N/A ____ NOTE: A "No" answer can still be in compliance.				 MANIFESTS ARE KEPT AT HES IN INDIANAPOLIS, IN NO SHIPMENTS BY WATER OR RAIL 
			b	In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes ____ No ____ N/A ____				
				Section 723.122: Recordkeeping				
			a	Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes ____ No ____				
	b	Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes ____ No ____ N/A <input checked="" type="checkbox"/>						
	c	Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes ____ No ____ N/A <input checked="" type="checkbox"/>						

TR-B-5

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				NO SHIPMENTS OUTSIDE THE U.S.
			e	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION
				OR				
			e	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				NO REQUESTS BY THE DIRECTOR

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges Section 723.130: Immediate Action a Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ____ No ____ c Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes ____ No ____				✓ NO SUCH INCIDENTS HAVE OCCURRED 
OTH	1	X		Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> - Clean-up the discharge? Yes ____ No ____ - Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ____ No ____ 				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status				
				Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	✓			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____ Is the facility only operating with a RCRA permit? Yes _____ No _____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			✓	NOT A NEW FACILITY
OTH	1				Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <u>✓</u> No _____ N/A _____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <u>✓</u> No _____ N/A _____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	✓			

PER-C-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1				Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 			<input checked="" type="checkbox"/>	NO CHANGES IN OWNERSHIP OR OPERATIONAL CONTROL

PER-C-3

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			THESE WASTES ARE NOT MANAGED BY THIS FACILITY
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

TSD-A-1

Area	Class	90 Day F U Req	Ke. Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	✓			NO WASTE RECEIVED FROM A FOREIGN SOURCE NO TRANSFER OF OWNERSHIP OR OPERATION
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A ✓			✓	
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ___ No ___ N/A ✓				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ___	✓			

TSD-B-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Circ.	QC Dev. Req.	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-3

Area	Class	QC Day or Night	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1	X		<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<input type="checkbox"/>	<input type="checkbox"/>		
				<input checked="" type="checkbox"/>	<input type="checkbox"/>			

TSD-B-4

Area	Class	90 Day F.L. Req	Key	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ____ No <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No ____</p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No ____</p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements a Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> a Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b1 Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b2 Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b3 Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b4 Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-B-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <p>* <u>725.274 (Containers);</u></p> <p>* <u>725.294 (Tanks);</u></p> <p>- 725.326 (Surface Impoundments);</p> <p>- 725.447 (Incinerators);</p> <p>- 725.477 (Thermal Treatment);</p> <p>- 725.503 (Chem. Phys. Bio. Treat.)</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <p>- The date and time of the inspection?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- The name of the inspector?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<ul style="list-style-type: none"> - A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
				<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

TSD-B-8

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				THESE INCIDENTS NOT LIKELY TO OCCUR

TSD-B-9

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes			<input checked="" type="checkbox"/>	
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-10

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
			a		Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b		Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F II Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes _____ No _____ N/A _____</p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			✓	

TSD-B-12

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

TSD-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
			d	<ul style="list-style-type: none"> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p> <p>Section 725.133: Testing and Maintenance of Equipment</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				

TSD-C-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems	✓			THERE IS NEVER ONLY ONE EMPLOYEE ON THE PREMISES DURING OPERATING HOURS
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <u>✓</u> No <u> </u> N/A <u> </u>				
OTH	1	X	b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <u> </u> No <u> </u> N/A <u>✓</u>				
				Section 725.135: Required Aisle Space	✓			
OTH	2			Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
				Section 725.137: Arrangements with Local Authorities	✓			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

TSD-C-3

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				<p>LEMONT POLICE & FIRE DEPARTMENTS</p> <p>LEMONT AUTHORITIES WOULD TYPICALLY RESPOND</p> <p>SILVER CROSS HOSPITAL</p>
					<p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>NO SUCH INCIDENTS HAVE OCCURRED</p>

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2			Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-1

Area	Class	90 Day Full Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-D-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.153: Copies of Contingency Plan				
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-D-3

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	2				725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: <ul style="list-style-type: none"> a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			THE PLAN HAS NOT FAILED
OTH	2				Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			
							<p>12-11-92: ~ 20 gallons of H.W. FUEL RELEASED INTO SECONDARY CONTAINMENT OF DRUM PROCESSING UNIT</p> <p>12-14-92: ~ 30 gallons of H.W. FUEL RELEASED INTO SECONDARY CONTAINMENT OF DRUM PROCESSING UNIT</p> <p>3-4-93: ~ 50 gallons of H.W. FUEL RELEASED INTO SECONDARY CONTAINMENT OF DRUM PROCESSING UNIT</p> <p>ALL PROPER PROCEDURES FOLLOWED</p>	

TSD-D-5

Area	Class	90 Day F L' Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:				
				a1 1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				a2 2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				a3 3) Immediately give one copy of the completed manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				a4 4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				a5 5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-E-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Does the facility initiate shipments of hazardous waste? Yes <input checked="" type="checkbox"/> No ____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>	<input checked="" type="checkbox"/>			NO SHIPMENTS RECEIVED BY WATER OR RAIL
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes <input checked="" type="checkbox"/> No ____</p>				
			d	<p>If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				DISCREPANCIES ARE ROUTINELY RESOLVED

TSD-E-2

Area	Class	90 Day Full Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
			a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

NOT A DISPOSAL FACILITY

TSD-E-3

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <p>- 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.441 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-E-4

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				


TSD-E-5

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	2				Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	<input checked="" type="checkbox"/>			
OTH	1				Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			



TSD-E-7

Area	Class	90 Day Full Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	<input checked="" type="checkbox"/>			<p>NONE REQUIRED</p> <p>↓</p>
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

TSD-E-8

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				FACILITY IS NOT CURRENTLY GOING THROUGH CLOSURE 
			Section 725.212: Closure Plan a Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>				

TSD-6/H-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____ - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____ 				 NOT A DISPOSAL FACILITY 
				Section 725.218: Post-Closure Plan a Was the most current facility post-closure plan available during the inspection? Yes ____ No ____ Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____				
				Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	✓			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? NOTE: If no post-closure plan, mark "N/A".				NOT A DISPOSAL FACILITY

TSD-G/H-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
				Section 725.271: Condition of Containers	✓			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
OTH	1	X		Section 725.272: Compatibility of Waste with Containers	✓			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
OTH	1	X		Section 725.273: Management of Containers	✓			
			a	Are containers of hazardous waste always closed during storage? Yes <u>✓</u> No <u> </u>				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No <u> </u>				
OTH	2			Section 725.274: Inspections	✓			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <u>✓</u> No <u> </u>				


TSD-I-1

Area	Class	90 Day F L Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	✓			

TSD-I-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems</p> <p>Section 725.290: Applicability</p> <p>Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p>NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Failing the filter test means that the waste contains free liquids.</p>				<p>TANKS CONTAIN LIQUID WASTES AND ARE LOCATED IN AN OUTSIDE TANK FARM</p> <p>TANKS HAVE SECONDARY CONTAINMENT</p> <p>↓</p>
			a	<p>Section 725.291: Assessment of Existing Tank Systems</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>				

TSD-J-1


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____ <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>				
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____ 			✓	

TSD-J-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ____ No ____	<input checked="" type="checkbox"/>			↓
				Section 725.293: Containment and Detection of Releases				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				NO NEW TANKS
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				THESE WASTES ARE NOT MANAGED
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ____ No ____ N/A <input checked="" type="checkbox"/> <u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				TANKS ARE OF KNOWN AGE ↓
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				NO SUCH WASTES ARE MANAGED .

Area	Class	90 Day F U Ren	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ul style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				


TSD-J-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNDERGROUND TANKS 


TSD-J-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ____ No <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			manual system currently in place — auto. cut-offs + high-level alarms to be installed w/in a year of the effective date of the Part B permit NO OPEN TANKS
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
OTH	2			Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No ____	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input checked="" type="checkbox"/> No ____ NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).	<input checked="" type="checkbox"/>			

TSD-J-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ____ No ____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p>				<p>RELEASES HAVE ALL BEEN SPILLS INTO THE SECONDARY CONTAINMENT SYSTEM (NO LEAKS)</p> 


TSD-J-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>				 <p>NO TANKS GOING THROUGH CLOSURE</p>
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ___ No ___</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ___ No ___</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ___ No ___</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

TSP-J-8

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>			<input checked="" type="checkbox"/>	INCOMPATIBLE WASTES ARE NOT STORED IN THE SAME TANK

TSD-J-9


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:				SUBSTANTIALLY DIFFERENT WASTES ARE NOT PLACED IN THE SAME TANK 
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.				

TSD-J-10


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	I	X		PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
				Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	✓			
OTH	I	X	a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	✓			
OTH	I	X		Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				and				


726-D-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		b	<p>Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		c	<p>Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		d	<p>For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				THIS FACILITY DOES NOT ACCEPT HAZARDOUS WASTE FUEL
	II		f	<p>Has the marketer kept a copy of each certification, sent or received, for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH				Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel			✓	THIS FACILITY DOES NOT BURN HAZARDOUS WASTE FUEL 
	I	a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___					
	II	b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___					
	I	c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___					
			NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.					
	I	c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___					
	II	d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___					
	II	e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___					

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used Oil Burned for Energy Recovery				
				Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery	✓			
			b1	Has the marketer conducted an analysis of the used oil? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: If "No", then Subpart E applies. Does the oil exceed any of the specifications listed in 726.140(e)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	I		b2	Does the marketer only market the off-specification used oil to burners that have: notified USEPA of their used oil activities, have USEPA ID #, and have the proper combustion devices pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b3	Has the marketer re-notified USEPA as to used oil manage- ment activities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b4	Does the marketer have an invoice system such that re- ceiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	II		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				THIS FACILITY DOES NOT BURN USED OIL FUEL 
	II		b6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery			<input checked="" type="checkbox"/>	
				<u>NOTE:</u> Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.				
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b	Has the proper notification been given to USEPA? Yes <input type="checkbox"/> No <input type="checkbox"/>				
				<u>NOTE:</u> Explain your response in the remarks column.				

Area	Class	90 Day F U Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
	II		c	<p>Has the burner provided to a marketer, before accepting any off-specification oil, the one-time signed certification notice?</p> <p>Yes ___ No ___ N/A ___</p>				
	II		d	<p>If the burner blends off-specification oil so that it now meets specifications, have analyses been done?</p> <p>Yes ___ No ___ N/A ___</p> <p>NOTE: If "No", then Subpart E applies.</p>				
			e	<p>Is the burner maintaining the proper records for three years (invoices, analysis, certification notices)?</p> <p>Yes ___ No ___</p>				

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: HERITAGE ENVIRONMENTAL SERVICES
 U.S. EPA ID No.: [REDACTED] 03/1620007
 Street: CANAL BANK ROAD, NE
 City: LEMONT State: IL Zip: 60439
 Telephone: (708) 739-1151

Inspection Date: [REDACTED] Time: 9:00am-12:00pm

Weather Conditions: _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>DONNA CZECH</u>	<u>EPA/EP5</u>	<u>(708) 531-5900</u>

Facility Representatives: BOB GARCIA Plant MGR. (708) 739-1151

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	<u>✓</u>	<u>✓</u>	_____	<u>✓</u>	_____
First Third [40 CFR 268.10]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____
Second Third [40 CFR 268.11]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____
Third Third [40 CFR 268.12]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- 1) FUEL BLENDING OF HAZARDOUS WASTES WITH WASTE OILS
- 2) RE-PACKAGING OR RE-MANIFESTING HAZARDOUS WASTES ACCEPTED FROM OFF-SITE GENERATORS

LDR Waste Management:

ALL LAND RESTRICTED WASTES ARE SHIPPED OFF SITE FOR TREATMENT OR INCINERATION.

Summary:

NO APPARENT VIOLATIONS OF THE LAND DISPOSAL RESTRICTION REGULATIONS WERE OBSERVED.

Signature: *Donna J. Czech*

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
F001 THROUGH F005 SPENT SOLVENTS
2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):
VARIOUS WASTE CODES POSSIBLE
4. First Third Wastes [40 CFR 268.10]:
VARIOUS WASTE CODES POSSIBLE
5. Second Third Wastes [40 CFR 268.11]:
VARIOUS WASTE CODES POSSIBLE
6. Third Third Wastes [40 CFR 268.12]**:
VARIOUS WASTE CODES POSSIBLE

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ☒ No ☐

If no, list below:

<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____
_____	_____
_____	_____
_____	_____

* Areas of concern includes California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]
 Yes ___ No ☒ List _____
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]
 Yes ___ No ☒ List _____
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ___ No ☒ List _____
9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ___ No ☒ List _____
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ___ No ☒ List _____
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]
 Yes ___ No ☒ List _____

*Note: Incorrect reference (40 CFR 268.2(a)(7)) in Third Third rule.

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. **F001-F005 Spent Solvent Wastes:** Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>F001</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>↓</u>	<input type="checkbox"/>	<u>↓</u>
<u>F005</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. **F020-F023 and F026-F028 Dioxin Wastes:** Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. **First, Second, and Third Third Wastes:**

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
VARIOUS		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☒ No ☐ NA ☐

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ☐ No ☒ NA ☐

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

☐ Organometallics: 40 Part 268, Appendix IV constituents
☐ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ☐ No ☐ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ 50 to 500 ppm PCBs
☐ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☒ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
_____	_____	____/____/____
_____	_____	____/____/____
_____	_____	____/____/____

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☒ NA ☐

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☒ No ☐

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☒ No ☐

Comments RESTRICTED WASTES ARE MIXED VIA FUEL BLENDING

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

ALL INCOMING WASTES,

LISTED WASTES & INFORMATION PROVIDED BY OFF-SITE GENERATORS

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix 1, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

HAZARDOUS WASTE FUEL (2-23-93)
WASTE FLAMMABLE SOLIDS (1-15-93)

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☒ NA ☐

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. 84-66)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

List the wastes LISTED WASTES IN FUEL BLENDING (FOOD-FOODS, etc.)

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments INCINERATION; FUEL BLENDING

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = 0001(except high TOC nonwastewaters), 0002, and 0003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ☐

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments FACILITY HAS INTERIM STATUS FOR TREATMENT, STORAGE
(PART B PERMIT APPLIED FOR)

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
VARIOUS	HES - INDIANAPOLIS, IN
	TWI - SAUGET, IL
	ROLLINS - BATON ROUGE, LA
	CONTINENTAL CEMENT - HANNIBAL, MO

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ☒ No ☐

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage (PART B PERMIT APPLIED FOR)

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ☒ No ☐

(If yes, the Generator checklist must also be completed.)

WASTES OF DIFFERENT DOT SHIPPING DESCRIPTIONS ARE MIXED
 IN THE FUEL BLENDING PROCESS

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ☐ No ☐

Comments _____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ☐ No ☐ NA ☐

(If Yes, the TSD checklist must also be completed.)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
California List Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? 2/19/

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☒ Generator provides data
☒ Facility performs analyses in on-site laboratory
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☒ No ☐ NA ☐

If analyses are conducted off site, identify lab: HERITAGE LAB INC. in Romeoville, IL

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☒ No ☐ NA ☐

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

HAZARDOUS WASTE FUEL (2-23-93)
WASTE FLAMMABLE SOLIDS (1-15-93)

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in liquid hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☒ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications? [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☐ No ☐ NA ☒

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.) \

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☒ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ☐ No ☐

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ☐ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ☐ No ☐

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ☐ No ☐

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☒ No ☐ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ☐ No ☒ NA ☐ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ☒ No ☐ FUEL BLENDING

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ☐ No ☐ NA ☒

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
<u>VARIOUS</u>	<u>CHEMICAL + PHYSICAL</u>
<u>↓</u>	<u>SEPARATION FOLLOWED BY</u>
<u>✓</u>	<u>FUEL BLENDING</u>

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ✓ No ___ (If No, go to c.)

List the wastes LISTED SOLVENTS + DCOX WASTES (FUEL BLENDING)

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ✓ No ___

If yes, is this method used for the aggregated wastes?

Yes ✓ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☒ No ☐

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☒ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☐ No ☒ (If No, go to 10.) ONLY NON-HAZARDOUS
TANK BOTTOMS

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☐ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☒ No ☐ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>VABIDUS</u>	<u>HES - INDIANAPOLIS, IN</u>
<u>+</u>	<u>ROLLINS - LOUISIANA</u>
<u>+</u>	<u>TWI - SAUGET, IL</u>
<u>+</u>	<u>CONTINENTAL CEMENT - HANNIBAL, MO</u>

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ☒ No ☐

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ☐ No ☐

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ☐ No ☐ NA ☐

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ☐ No ☐

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

TSD

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

VARIOUS

HES - INDIANA

TWI

TWI - ILLINOIS

ROLLINS

ROLLINS - LOUISIANA

CONTI CEMENT - MISSOURI

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ☒

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

N/A 5.

Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ☐ No ☐ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

6. **Dilution Prohibition [40 CFR 268.3]:**

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

List the wastes LISTED SOLVENTS & IGNITABLE WASTES

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments INCINERATION; FUEL BLENDING

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes _____ No ✓

Comments

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

This image shows a full page of a document template. It consists of a white background with approximately 20 evenly spaced, thin black horizontal lines running across the width of the page. There are no margins, text, or other markings present.

Name of Facility: HERITAGE ENVIRONMENTAL SERVICES
I.D. Number: ILD 085349264 0311620007
Location: CANAL BANK ROAD, NE
LEHONT, ILLINOIS 60439
Date of Inspection: MARCH 30, 1993
Inspector: DONNA CZECH
Telephone Number: (708) 531-5900

☒ Interim Status ☐ RCRA Permit
☒ Treatment ☒ Storage ☐ Disposal
☐ Land Disposal Facility

VALED
3-30-93

Are there any known releases? Yes ☒ No ☐

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ☐ No ☒ N/A ☒

Any Class I violations? Yes ☐ No ☒

If yes, identify type briefly _____

Schedule for next inspection: SEPTEMBER 1993

RCRA INSPECTION REPORT

OPERATOR

PERSON(S) INTERVIEWED

PHONE #**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

PREPARED BY

AGENCY/TITLE**PHONE #**

SUMMARY OF APPARENT VIOLATIONS

[illegible]

Facility I e: HERITAGE ENV SERVICES
 USEPA #: IL 0085349264
 IEPA #: C311620007

WASTE DISPOSITION FORM

9-9-92

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 91	* 19 90	* 19 89					
HAZ WASTE FUEL	IGNITABLE HW & NH WASTE CIL	9-31-92	FOU-5 0001-43 VARIES	Y	Y	(G)	(G)	(G)	62000 GALS	~100000 GALS/MONTH	8-22-92	CONTINENTAL CEMENT- HANNIBAL MO
WASTE PETROLEUM NAPHTHA	2 PARTS WASHERS	KNOW	0001			(G)	(G)	(G)	NONE	144 GALS/YR	NA	BLENDED WITH HW FUEL
WASTE FLAMMABLE SOLIDS	SPILLS, REMED MOTORS STRAINER CLEANINGS	QA/QC	FOU-5			(G)	(G)	(G)	40 DRUMS	~40000 163 1/4	8-18-92	ROLLINS ENV. BATON ROUGE, LA
LAB PACKS	OFF-SITE CLEANUPS	INVENTORY SHEETS	VARIES			(G)	(G)	(G)	65 DRUMS	~40 DRUMS/MON.	8-25-92	TW1 SAUGET, IL
LISTED HAZARDOUS WATER	OFF-SITE	QA/QC KNOW.	VARIES			(G)	(G)	(G)	0	~10000 GALS/YR		ADDED TO HAZ WASTE FUEL GOING FOR INCIN.
TEMPORARY STORAGE WASTE	INORGANIC WASTE NOT TREATED ON-SITE	9-4-92	VARIES			(G)	(G)	(G)	80 DRUMS	~80 DRUMS/MON.	8-14-92	HES INDIANAPOLIS, IN
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				

* All "NO" responses must be explained in narrative.

NARRATIVE

Heritage Environmental Services (HES) is currently operating three divisions at the Lemont facility. First, Heritage operates a treatment plant which includes storage and treatment of hazardous wastes. The second division is Petroleum Management where HES picks up waste oil from off-site generators on a multi-stop permit. Lastly, HES has added a parts washer service under the name of Crystal Clean. Petroleum naphtha is used by customers as a solvent, which, along with the washer units, is supplied by Crystal Clean. The spent material has been exempted as a solid waste by the Permit section in Springfield. Trumbull- a division of Owens-Corning Fiberglass Corp uses the spent solvent as a diluent and reactant in roof lapping compounds. Transportation at HES is a part of the Petroleum Management division, however manifests are kept at HES's Indianapolis, IN facility.

Industrial oils are accepted from off-site generators and processed to produce waste oil fuel. Approximately 90% of the fuel is on-spec and shipped to facilities such as Ameropan- Chicago, IL and North Vernon Forge- North Vernon, IN. The remaining 10% of fuel is off-spec and either mixed with the hazardous waste fuel or sent to HES in Indianapolis for treatment along with residual water and the rag layer (oil/water).

Low flash wastewaters are treated by de-watering or separating the phase layers. The fuel layer is blended into hazardous waste fuel while the non-hazardous waste is shipped to HES in Indiana for treatment.

Greases, paints, and solvents are accepted for hazardous waste fuel blending. Fuel with acceptable BTU value is shipped to cement kilns such as Systech- Greencastle, IN and Continental Cement- Hannibal, MO. Residual sludge and strainer cleanings from this process are shipped to an off-site incinerator as hazardous waste.

HES receives drums of waste for temporary storage from off-site generators. These wastes are mainly corrosives, plating wastes, and other inorganic wastes. These, along with heavy hazardous waste fuels which cannot be treated on-site, are shipped to HES in Indiana for treatment.

Lab packs are also accepted by HES from off-site generators. These wastes are temporarily stored prior to shipment off-site for incineration or treatment.

HAZARDOUS WASTE GENERATED

Hazardous waste fuel- F001-5, K086, D00X, Varies- Produced from ignitable hazardous waste and non-hazardous waste oil. Approx 100,000 gallons/month generated and shipped to Continental Cement- Hannibal, MO or Systech- Greencastle, IN (cement kilns). About 62,000 gallons presently on-site.

Heritage Environmental Services
0311620007
9-9-92

Waste petroleum naphtha- D001- From 2 parts washers. Approx 144 gallons/year generated and blended into hazardous waste fuel on-site.

Waste flammable solids- F001-5, D001- Spills, remediation projects, strainer cleanings from secondary fuel blending. Approx 40,000 lbs/quarter generated and shipped to Rollins Environmental- Baton Rouge, LA. 80 drums currently on-site.

Lab packs- Various waste codes- Approx 40 drums/month generated and shipped to TWI- Sauget, IL. 65 drums currently on-site.

Listed hazardous water- Various waste codes- Hazardous wastewater from off-site generators. Approx 10,000 gallons/year generated and added to hazardous waste fuel going for incineration. No waste currently on-site.

Temporary storage waste- Various waste codes- Mainly inorganic wastes not treated on-site. Approx 80 drums/month generated and shipped to HES- Indianapolis, IN. 80 drums currently on-site.

HAZARDOUS WASTE UNITS

S01- Container Storage

- Area 1- Container Storage/Processing Building
 - Concrete foundation with coated storage bays
 - Capacity- 468-55 gallon drums + 2-220 gallon totes
- Area 2- Diked Concrete Pad
 - Capacity- 260-55 gallon drums
- Area 3- Van Trailers (10)
 - Capacity- 800-55 gallon drums

S02- Tank Storage

- Tanks are located in a tank farm with a concrete floor and walls
- VRT 1-4 Initial vacuum receiving tanks
- CB 1-4 Cone bottom gravity separation tanks
- SF 1-7 Supplemental fuel storage tanks

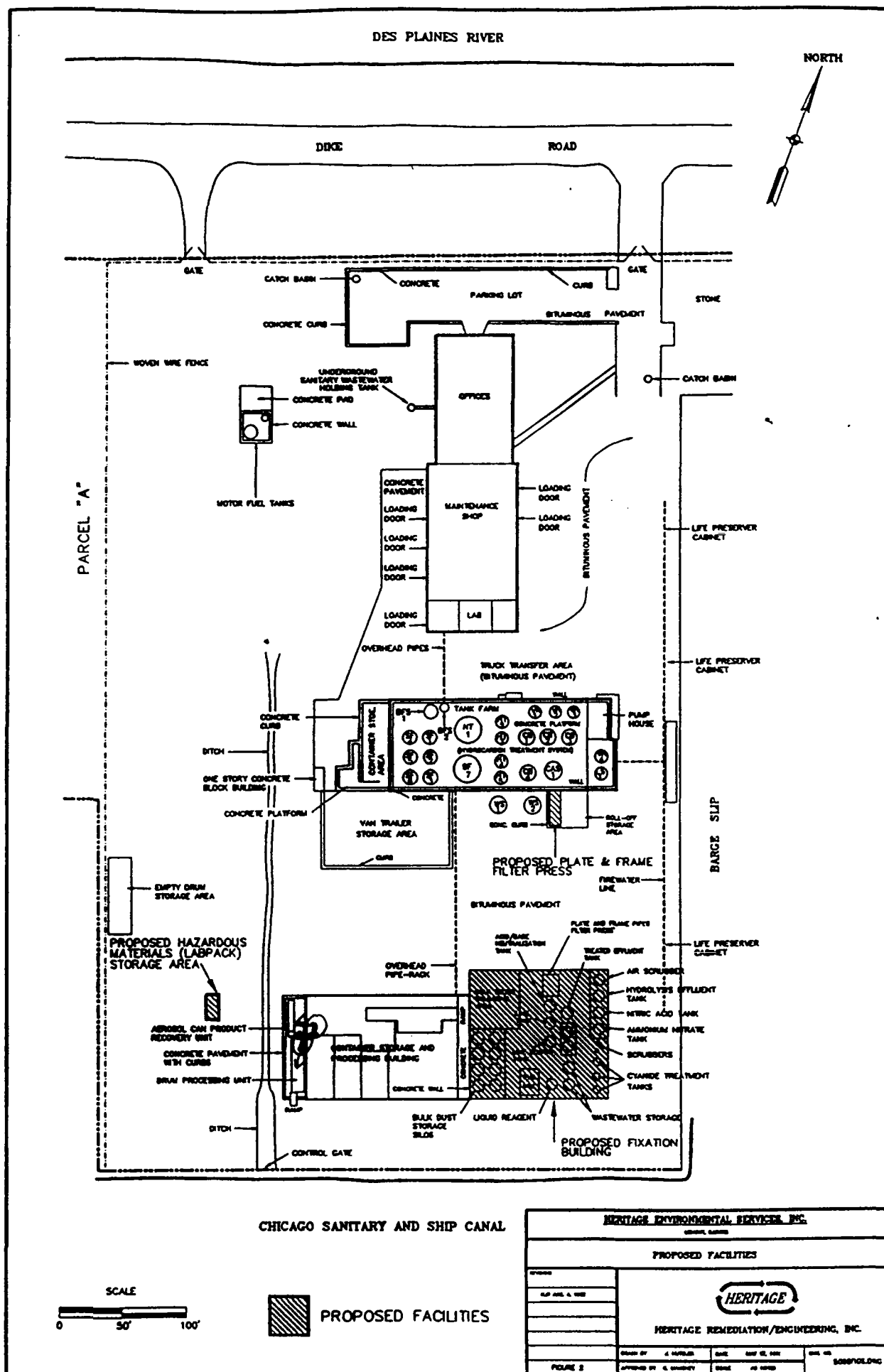
T01- Treatment in Tanks

- Tanks are located in a tank farm with concrete floor and walls
- HT 1-5 Oil/hydrocarbon heat treatment tanks

T04- Other

Not occurring during inspection

Heritage Environmental Services is currently operating in compliance with state regulations and a CAFO issued on 9-26-85.



ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY PHOTOGRAPHS

9-9-92

TIME: 945AM-215PM

SITE NAME: HERITAGE

ENV SERVICES

SITE #: 0311620007

COUNTY: COOK

COMMENTS: S

DRUM

PROCESSING

UNIT

PHOTOGRAPH BY:

PHOTO #: 1 ROLL #: 93-74



COMMENTS: U

AEROSOL CAN

PRODUCT RECOVERY

UNIT

PHOTOGRAPH BY:

PHOTO #: 2 ROLL #: 93-74



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	<input checked="" type="checkbox"/>			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

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23 SEP 1992
IEPA/DLPC

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____ Is the facility only operating with a RCRA permit? Yes ____ No ____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			✓	NOT A NEW FACILITY
OTH	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <u>✓</u> No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <u>✓</u> No ____ N/A ____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	✓			


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1			Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	<input checked="" type="checkbox"/>			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			INDIANA MISSOURI LOUISIANA
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: <ol style="list-style-type: none"> Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>NO BULK SHIPMENTS BY WATER OR RAIL</p> <p>↓</p>


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	NO WASTE READY FOR TRANSPORTATION OFF SITE 
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____			✓	
				b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.	✓			GENERATOR IS ALSO A TRANSPORTER; OTHERWISE TRANSPORTER SUPPLIES PLACARDS
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	✓			NO ACCUMULATION WASTE DECLARED STORAGE AREA 

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO REQUESTS BY DIRECTOR


GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time	<input checked="" type="checkbox"/>			
				<p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> <i>NA</i></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>N/A</i></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/></p>				REMOVED REMOVED
a4		<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>						

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	✓			
MAN	1			Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			✓	NO EXCEPTION REPORTS REQUIRED 

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>				<p>↓ NO ADDITIONAL REPORTS REQUIRED</p>
					<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>			✓	

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1/2				<p>PART 722</p> <p>GENERATOR STANDARDS</p> <p>Subpart E: Exports of Hazardous Waste</p> <p>Section 722.152: General Requirements</p> <p>Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No <u>✓</u></p> <p>NOTE: If "No", skip Subpart E. If "Yes", answer the next question.</p> <p>Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____</p> <p>NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.</p>			✓	<p>NO EXPORTS OF HAZARDOUS WASTE</p> 

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			<input checked="" type="checkbox"/> NO IMPORTS OF HAZARDOUS WASTE	
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;				
				and				
			b2	Has the importer or his agent signed the manifest in place of the generator;				
				and				
	b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____						
	c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____						

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Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2	X		<p>PART 722 GENERATOR STANDARDS Subpart G: Farmers</p> <p>Section 722.170: Farmers</p> <p>Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:</p> <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>			✓	NO FARMING ACTIVITY

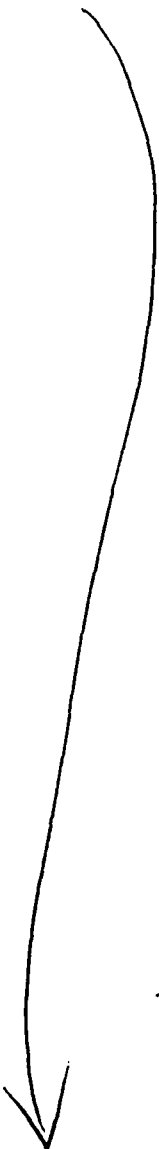
GEN-G-1


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes _____ No <input checked="" type="checkbox"/> Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes <input checked="" type="checkbox"/> No _____				FUEL BLENDING - TRANSPORTER IS ALSO A TREATMENT FACILITY
				NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form. Section 723.111: USEPA Identification Number a Has the transporter obtained a USEPA identification number?	<input checked="" type="checkbox"/>			
OTH	1	X		Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: - For a period of 10 days or less? Yes _____ No <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			TRANSPORTER IS ALSO A STORAGE FACILITY

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1/2			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping				TRANSPORTER MANIFESTS ARE KEPT AT HES IN INDIANAPOLIS
				Section 723.120: The Manifest System				
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes ____ No ____				
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> - Signed and dated the accompanying manifests? Yes ____ No ____ - Returned a signed copy to the generator before leaving the generator's property? Yes ____ No ____ 				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes ____ No ____				
d	Has the transporter who delivers hazardous waste to another transporter or to the designated facility:							

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Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes ____ No ____ 2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes ____ No ____ 3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes ____ No ____				
			e	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ____				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes ____ No ____ N/A ____				
			g	Has the transporter who transports hazardous waste out of the United States:				
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes ____ No ____ 2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes ____ No ____				
				4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes ____ No ____				
				Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes <input checked="" type="checkbox"/> No ____	✓			
				NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes ____ No <input checked="" type="checkbox"/>				
				AND				
				If "Yes", is the transporter recording on a log or shipping paper:				
				1) Name, address and USEPA ID number of the generator of the waste;				
				AND				
				2) Quantity of waste accepted;				
				AND				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p style="text-align: center;">AND</p> <p>4) The date the waste is accepted? Yes ____ No ____</p> <p style="text-align: center;">AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes ____ No ____</p> <p style="text-align: center;">AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes ____ No ____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes <input checked="" type="checkbox"/> No ____</p> <p style="text-align: center;">OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p>				

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Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				NO SHIPMENTS OUTSIDE THE U.S. NO UNRESOLVED ENFORCEMENT ACTION NO REQUESTS BY DIRECTOR
			e	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				OR				
			e	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges Section 723.130: Immediate Action a Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ____ No ____ c Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes ____ No ____			✓	NO DISCHARGES FROM TRANSPORT VEHICLES 
OTH	1	X		Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> - Clean-up the discharge? Yes ____ No ____ - Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ____ No ____ 			✓	

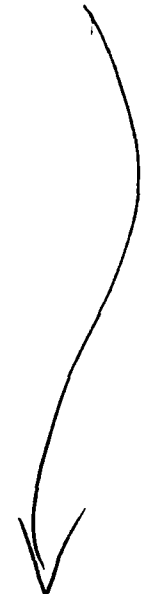
Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	I	X		PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQ6) are exempt from this subpart.				
				Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	✓			
OTH	I	X	a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	✓			
OTH	I	X		Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				


and

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		b	<p>Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		c	<p>Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		d	<p>For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		f	<p>Has the marketer kept a copy of each certification, sent or received, for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			11r		Sub Sec	Yes		
OTH				Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel			✓	FACILITY DOES NOT BURN H.W. FUEL 
	I	a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ____ No ____ N/A ____					
	II	b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ____ No ____ N/A ____					
	I	c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ____ No ____					
	NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.							
	I	c	Is the facility in compliance with 722.134? Yes ____ No ____ N/A ____					
	II	d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ____ No ____ N/A ____					
	II	e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ____ No ____ N/A ____					

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used Oil Burned for Energy Recovery				
				Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery	✓			
				b1 Has the marketer conducted an analysis of the used oil? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: If "No", then Subpart E applies. Does the oil exceed any of the specifications listed in 726.140(e)? <i>10% OFF TIME</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>				
	I			b2 Does the marketer only market the off-specification used oil to burners that have: notified USEPA of their used oil activities, have USEPA ID #, and have the proper combustion devices pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II			b3 Has the marketer re-notified USEPA as to used oil management activities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II			b4 Does the marketer have an invoice system such that receiving facilities get an invoice with all the information required by 726.143(b)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	II		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				FACILITY DOES NOT BURN USED OIL 
	II		b6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery			<input checked="" type="checkbox"/>	
				NOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.				
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b	Has the proper notification been given to USEPA? Yes <input type="checkbox"/> No <input type="checkbox"/>				
				NOTE: Explain your response in the remarks column.				

Area	Class	90 Day F U Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
	II		c	<p>Has the burner provided to a marketer, before accepting any off-specification oil, the one-time signed certification notice?</p> <p>Yes ___ No ___ N/A ___</p>				
	II		d	<p>If the burner blends off-specification oil so that it now meets specifications, have analyses been done?</p> <p>Yes ___ No ___ N/A ___</p> <p>NOTE: If "No", then Subpart E applies.</p>				
			e	<p>Is the burner maintaining the proper records for three years (invoices, analysis, certification notices)?</p> <p>Yes ___ No ___</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <u>✓</u> NOTE: If "Yes", explain in narrative.	<u>✓</u>			FACILITY DOES NOT MANAGE THESE WASTES
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No _____ <u>N/A</u> <u>✓</u>				

TSD-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	✓			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A ✓ b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ✓ No ___ N/A ___			✓	NO WASTE ACCEPTED FROM FOREIGN SOURCES
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ___	✓			

TSD-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				GENERATOR PROVIDES PRE-ACCEPTANCE INFO. - REVIEWED ANNUALLY - TESTED IF NECESSARY - EV. INCOMING LOADS HAS QA/QC ANALYSIS DONE ON A REP. SAMPLE
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSO-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - <u>725.293 (Tanks);</u> - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<input type="checkbox"/>	<input type="checkbox"/>		
				<input checked="" type="checkbox"/>	<input type="checkbox"/>			

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ____ No <input checked="" type="checkbox"/></p> <p>OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No ____</p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No ____</p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements	<input checked="" type="checkbox"/>			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - <u>725.274 (Containers)</u>; - <u>725.294 (Tanks)</u>; - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	<input checked="" type="checkbox"/>			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-8-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes _____ No _____ N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
					NOTE: A "Yes" answer is a violation of the location standard.				

TSD-B-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			ALARM PA SYSTEM

TSD-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		FIRE EXTINGUISHERS SPILL STATIONS SAFETY SHOWERS
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:				
				- Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				WEEKLY
				- Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				MONTHLY
				- Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				WEEKLY
				- Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				↓
				NOTE: Any "N/A" answer must be explained in the Comments.				

TSD-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			THERE IS ALWAYS MORE THAN ONE EMPLOYEE ON SITE DURING OPERATING HOURS
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>LEMONT POLICE & FIRE COOK CO. SHERIFF ILL. ESDA</p> <p>TYPICALLY, LEMONT PERSONNEL WOULD RESPOND</p> <p>SILVER CROSS HOSPITAL in JOLIET BOLING BROOK MILLS CR.</p> <p>NO REFUSALS</p>

TSD-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan	✓			
				a Is a plan available? Yes <u>✓</u> No <u> </u> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <u>✓</u> No <u> </u> b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <u>✓</u> No <u> </u> N/A <u> </u>				
OTH	2			Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <u>✓</u> No <u> </u> 2) Explosions? Yes <u>✓</u> No <u> </u>	✓			

TSD-D-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>f Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>f Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>f Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.153: Copies of Contingency Plan</p> <p>a Has a copy (and all revisions) of the contingency plan:</p> <p>a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSU-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			PLAN HAS NOT FAILED
OTH	2			Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			<p>9-1-88 SHREDDER EXPLOSION SEE MARCH 1989 INSPECTION REPORT</p> <p>2 MINOR RELEASES</p> <p>1-6-92 SMALL FIRE SEE 3-20-92 REPORT REPORT</p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System	✓					
			Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							
			NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.							
			For each manifest reviewed, did the facility:							
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>						
a3	3) Immediately give one copy of the completed manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>									
a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>									
a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>									


TSD-E-1


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the facility initiate shipments of hazardous waste? Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>	<input checked="" type="checkbox"/>			NO SHIPMENTS BY WATER OR RAIL
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes <input checked="" type="checkbox"/> No _____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes <input checked="" type="checkbox"/> No _____</p>				


TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record a Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
								NOT A DISPOSAL FACILITY ↓

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				<p>THESE METHODS NOT EMPLOYED BY FACILITY</p> 

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				<p>THESE DATA NOT REQUIRED</p> 


Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	2				11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				NOT A DISPOSAL FACILITY
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>					
					Section 725.174: Availability, Retention and Disposition of Records	<input checked="" type="checkbox"/>			NOT A DISPOSAL FACILITY 
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION OR REQUESTS BY DIRECTOR	

TSD-E-6



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
OTH	1			Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	<input checked="" type="checkbox"/>			
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				FACILITY IS NOT GOING THROUGH CLOSURE 
			a	Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 	<input checked="" type="checkbox"/>			

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ___ No ___ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ___ No ___ N/A <input checked="" type="checkbox"/> 				 NOT REQUIRED 
				Section 725.218: Post-Closure Plan				
				a Was the most current facility post-closure plan available during the inspection? Yes ___ No ___				
				Was the post-closure plan submitted to the Agency within the time frame established in this sub-section? Yes ___ No ___ N/A ___				
FIN	1			Section 725.242: Cost Estimate for Closure				
				Has the facility prepared a written estimate of the cost of closing the facility?	<input checked="" type="checkbox"/>			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care				
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?			<input checked="" type="checkbox"/>	NOT REQUIRED
				NOTE: If no post-closure plan, mark "N/A".				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	✓			
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	✓			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	✓			
				b Are containers of hazardous waste being opened, handled or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	✓			

Area	Class	90 Day F U Req	Key Lr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
				<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p>				
OTH	1	X		<p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
OTH	1	X		<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	✓			

TSD-I-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems</p> <p>Section 725.290: Applicability</p> <p>Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p>NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Failing the filter test means that the waste contains free liquids.</p>				LIQUID WASTE STORED IN TANK FARM OUTSIDE
			a	<p>Section 725.291: Assessment of Existing Tank Systems</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>	<input checked="" type="checkbox"/>			


TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				<p>NO NEW TANKS</p> 
				<p>Section 725.292: Design and Installation of New Tank Systems or Components</p>				
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgment, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ____ No ____				<div style="text-align: center;">↓</div> AGE OF TANKS IS UNKNOWN - SECONDARY CONTAINMENT IS ANTICIPATED BY 1995
				Section 725.293: Containment and Detection of Releases	✓			
		a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ____ No ____ N/A ✓					
		a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ____ No ____ N/A ✓					
		a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes ____ No ____ N/A ✓					
		a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ✓ No ____ N/A ____ or If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ____ No ____ N/A ✓					
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e). "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNDERGROUND TANKS 

TSD-J-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			MANUAL INSPECTIONS DURING FILLING NO UNCOVERED TANKS NO LEAKS OR SPILLS
OTH	2			Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspections as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).			<input checked="" type="checkbox"/>	NO LEAKS OR SPILLS 

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes _____ No _____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes _____ No _____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes _____ No _____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes _____ No _____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes _____ No _____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p>				

TSD-J-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>				 <p>FACILITY NOT GOING THROUGH CLOSURE</p>
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>			<input checked="" type="checkbox"/>	INCOMPATIBLES ARE NOT STORED IN THE SAME TANK

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			✓	TANKS NOT USED TO STORE SIGNIFICANTLY DIFFERENT WASTES
			a 1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____ or b 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____ NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.					

GEN/TS/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: HERITAGE ENVIRONMENTAL SERVICES
U.S. EPA ID No.: [REDACTED] 031/62 0007
Street: CANAL BANK ROAD NE
City: LEWISTON State: IL Zip: 60439
Telephone: 708 739 1151

Inspection Date: [REDACTED] Time: 945A-215PM
Weather Conditions: 70°F

	Name	Agency/Title	Telephone
Inspectors:	<u>JAMES HAENNKE IEPA/EP5 708 315900</u>		
Facility Representatives:	<u>BOB GARCIA PLANT MGR 708 739 1151</u>		

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
F020-F023 and F026-F028	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List*	<u>✓</u>	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>
First Third [40 CFR 268.10]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Second Third [40 CFR 268.11]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Third Third [40 CFR 268.12]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

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INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- FUEL BLENDING OF HAZ WASTE W/ WASTE OILS
- RE-PACKAGING OR RE-MANIFESTING HAZ WASTES
ACCEPTED FROM OFF SITE GENERATORS

LDR Waste Management:

ALL LDR WASTES SHIPPED OFF-SITE FOR
TREATMENT OR INCINERATION

Summary:

NO LDR VIOLATIONS

RECEIVED

11/11/01

Signature:

James Hamilton

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
F001 THROUGH F005 SPENT SOLVENTS

2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):
VARIOUS WASTE CODES POSSIBLE

4. First Third Wastes [40 CFR 268.10]:
VARIOUS WASTE CODES POSSIBLE

5. Second Third Wastes [40 CFR 268.11]:
VARIOUS WASTE CODES POSSIBLE

6. Third Third Wastes [40 CFR 268.12]**:
VARIOUS WASTE CODES POSSIBLE

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (33 FR 22331).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ☒ No ☐

If no, list below:

Assigned Classification

Correct Classification

_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern includes California List Wastes categories with more stringent treatment standards; listed/characteristic; and inorganic single and double leachates; P and Q waste codes; and K wastes; and waste code carry-through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code? [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F024-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (non-halogenated; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K053, K054, K055, K056, K057, K058, K059, K060, K061, K062, K063, K064, K065, K066, K067, K068, K069, K070, K071, K072, K073, K074, K075, K076, K077, K078, K079, K080, K081, K082, K083, K084, K085, K086, K087, K088, K089, K090, K091, K092, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K107, K108, K109, K110, K111, K112, K113, K114, K115, K116, K117, K118, K119, K120, K121, K122, K123, K124, K125, K126, K127, K128, K129, K130, K131, K132, K133, K134, K135, K136, K137, K138, K139, K140, K141, K142, K143, K144, K145, K146, K147, K148, K149, K150, K151, K152, K153, K154, K155, K156, K157, K158, K159, K160, K161, K162, K163, K164, 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6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☒ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

*Note: Incorrect reference (40 CFR 268.2(a)(7)) in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001	<input type="checkbox"/>	<input checked="" type="checkbox"/>
↓	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F005	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCME. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
VARIOUS	_____	_____	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	_____	_____	<input checked="" type="checkbox"/>
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☒ No _____ NA _____

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes _____ No ☒ NA _____

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
 _____ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes _____ No _____ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. **California List Wastes:** Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs
 _____ ≥ 500 ppm PCBs

GEN

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☒ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
_____	_____	____/____/____
_____	_____	____/____/____
_____	_____	____/____/____

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☒ NA ☐

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☒ No ☐

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☒ No ☐

Comments RESTRICTED WASTES ARE MIXED VIA FUEL BLENDING

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [268.7(a)(5)]
ALL INCOMING WASTES - LISTED WASTES FROM
INFORMATION PROVIDED BY GENERATOR

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix 1, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the waste for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

[40 CFR 268.7(a)(5)]

HAZARDOUS WASTE FUEL

LAST TCLP TEST: ~~01-1-92~~ 3-31-92

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology)

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?

Yes ☐ No ☒ NA ☐

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. 84-646)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

GEN

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

F001-F005, etc.

List the wastes LISTED WASTES IN FUEL BLENDING

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments INCINERATION; FUEL BLENDING

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [40 CFR 268.3(a)]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
- ☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(a)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
- ☐ Non-toxic* characteristic wastes
- ☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = 9001 (except high pH), 9002, and 9003 (except cyanides and sulfides). DS in table.

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ☐

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments FACILITY HAS INTERIM STATUS FOR TREATMENT, STORAGE

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration-based treatment standards specified in 40 CFR 268.41 and 268.43, and to 40 CFR 268.42 required methods which result in treatment below the characteristic limit. See Appendix B.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards/prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
VARIOUS	HES - INDIANAPOLIS
↓	TWE - SAUGET, ILL.
↓	ROLLINS - LOUISIANA
	OHM - GEORGIA
	CWM - ILLINOIS

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☒ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ☐ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on file for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☐ No ☐ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the third third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
-------------------	--------------------------	--------------------------------------

- 2 Are treatment residuals generated from these units?**

Yes _____ No _____

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must also be completed.)

E Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

[illegible]

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ☒ No ☐

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ☒ No ☐

(If yes, the Generator checklist must also be completed.)

WASTES OF DIFFERENT DOT SHIPPING DESCRIPTIONS ARE
MIXED IN THE FUEL BLENDING PROCESS

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ☐ No ☐

Comments _____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ☐ No ☐ NA ☐

(If Yes, the TSD checklist must also be completed.)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
California List Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? 2/1/91

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☒ Generator provides data
☒ Facility performs analyses in on-site laboratory QA/QC
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes: ☒ No ☐ NA ☐

If analyses are conducted off site, identify lab: EHS LABS ROMEDVILLE, ILL.

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in liquid hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☒ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications? [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Includes both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☐ No ☐ NA ☒

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☒ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ☐ No ☐

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ☐ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ☐ No ☐

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ☐ No ☐

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☒ No ☐ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ☐ No ☒ NA ☐ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ☒ No ☐ FUEL BLENDING

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ☐ No ☐ NA ☒

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
VARIOUS	CHEMICAL & PHYSICAL
↓	SEPARATION FOLLOWED BY
	FUEL BLENDING

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ☐ No ☐

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ☐ No ☐

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ☒ No ☐ (If No, go to c.)

List the wastes LISTED SOLVENTS & DODAL WASTES (FUEL BLENDING)

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

If yes, is this method used for the aggregated wastes?

Yes ☒ No ☐

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☒ No ☐

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☒ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☐ No ☒ (If No, go to 10.)

*ONLY NON-HAZARDOUS
TANK BOTTOMS*

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☐ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☒ No ☐ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>VARIOUS</u>	<u>HES. - INDIANAPOLIS</u>
<u>↓</u>	<u>OHM - GEORGIA</u>
<u>↓</u>	<u>ROLLINS - LOUISIANA</u>

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ☒ No ☐

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ☐ No ☐

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ☐ No ☐ Not applicable

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ☐ No ☐

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(e)]

Yes ☐ No ☒ (If No, go to G.)

*Note: Do not include surface impoundments addressed in 8.

If yes, specify which units and what wastes each unit has received:

Unit	Wastes
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(e)(2)]

Yes ☐ No ☐

Comments _____

TSD

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____
Case-By-Case Extension (40 CFR 268.5) _____
No-Migration Petition (40 CFR 268.6) _____
Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by-case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix B.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

VARIOUS

HES - INDIANAPOLIS, IND.

↓

TWE - SAUGET, ILL.

RDEINS - LOUISIANA

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ☒

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

N/A 5.

Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ☐ No ☐ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

6. **Dilution Prohibition [40 CFR 268.3]:**

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

List the wastes LISTED SOLVENTS + IGNITABLE WASTES

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments INCINERATION, FUEL BLENDING

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

TSD

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

Managed in treatment systems regulated under the Clean Water Act

Non-toxic^o characteristic wastes

Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC narrowstomers), D002, and D003 (except cyanides and sulfides). (35 FR 22444)

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes No ✓

Comments

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or printed text on the paper.

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCA INSPECTION REPORT

USEPA #: IL 0285349264 IEPA #: 0311620007
 Facility Name: HERITAGE ENVIRONMENTAL SERVICES Phone #: 708 739 1151
 Street Address: CANAL BANK RD NE County: COOK
 City: LE MONT State: IL Zip: 60439
 Region: 2 Inspection Date: 3/20/92 From: 930 AM To: 130 PM
 Weather: 30°F

TYPE OF FACILITY

Notified As: G/TR/TSD/WAF/OSF/SOF Regulated As: G/TR/TSD/WAF/OSF/SOF
 LDF? N HPV? N 90-Day F/U Required?: YES NO ✓

TYPE OF INSPECTION

CEI: ✓ Sampling: Citizen Complaint: Closed: Other:
 CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS NA

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 2/19/90, from (initial) or (subsequent) Notification.
 Initial Part A Date: 1/12/81 Amended:
 Part A Withdrawal requested: Approved by (US)(IL) EPA:

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/10/88 Final Permit Issued:

ENFORCEMENT

Has the firm been referred to - USEPA: (Y) or N 4/1/85
 Illinois Attorney General: Y or (N) County State's Attorney: Y or (N)

ORDERS ISSUED

CACO: 4/1/85 CAFO: 9/26/85 Consent Decree:
 Federal Court Order: State Court Order: IPCB Order:

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1987	Was Activity Ever Done?	Closed	Being done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report		
							1991	1990	1989
501	Y	N	Y	N	Y	NA	Y	Y	Y
502	↓	↓	↓	↓	↓	↓	↓	↓	↓
T01	↓	↓	↓	↓	↓	↓	↓	↓	↓
T04	↓	↓	↓	↓	N	↓	N	N	N
						RECEIVED			
						- 8 APR 1992			
						IEPA/DLPC			

OWNER

OPERATOR

Name	MURPHY	Name	WILLIAM J. W. WELLS
Address	100 E. ERIE ST.	Address	CANAL BANK RD. NE
City	CHICAGO	City	LEMCNT
State	IL	State	IL
Zip	60611	Zip	60439
Phone #	312 675 8099	Phone #	708 739 1151

PERSON(S) INTERVIEWED

TITLE

PHONE #[illegible]**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

JAMES HAENNICKE	LEPA/LEPS	7025315900
/		

PREPARED BY

AGENCY/TITLE**PHONE #**

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SUMMARY OF APPARENT VIOLATIONS

[illegible][illegible][illegible]

Facility : HERITAGE ENVIRONMENTAL SERVICES
 USEPA #: 0085349264
 IEPA #: 0311620007 3-2092

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 91	* 19 90	* 19 89					
HAZ WASTE FUEL	IGNITABLE HW & A/H WASTE CIL	2-11-92	Y	Y	G	G	G	F	45000 GALS	1000 GALS/YR	3-12-92	CONTINGENTAL HEAT HANDLING CO. TULSA, OKLA.
WASTE PETROLEUM NAPHTHA	2 PARTS WAGITERS	KNOW			G	G	G	F	NOVE	1446 GALS/YR	NA	BLENDED HW FUEL CO.
WASTE FLAMMABLE SOLIDS	SPILLS, REMED PROTECTS, STRAINER CLEAVINGS FROM 2" FUEL BLENDING	QA/QC			G	G	G	F	40000 lbs	40000 lbs/YR	2-17-92	ROLLING MILL BATON ROUGE, LA
LAB PACKS	OFF-SITE CLEAN UPS	INDICATORY SHEETS	VARIES		G	G	G	F	80 DRUMS	40 DRUMS/MONTH	3-16-92	HES - INDIANAPOLIS, IN
LISTED HAZARDOUS WATER	OFF-SITE	QA/QC	VARIES		G	G	G	F	0	20000 GALS/YR	2-19-92	ROLLING MILL BATON ROUGE, LA
TEMP. STORAGE WASTE	INORGANIC WASTE NOT TREATED ON-SITE	QA/QC	VARIES		G	G	G	F	100 DRUMS	80 DRUMS/MONTH	3-17-92	CWM - BATON ROUGE, LA
SOLIDS	TANK BOTTOMS, SOIL, PASTIC DRUMS	2-10-92	NA	NA	G	G	G	F	0	20 YDS ³ /QUARTER	3-18-92	CID - ADDITVE CALUMET CITY
WASTE OIL, OIL/WATER MIXTURES	CANT BE TREATED ON-SITE	1-6-92			G	G	G	F	130000 GALS	71000000 GALS/YR	3-19-92	HES - INDIANAPOLIS, IN
TREATMENT WATER	SEPARATION OF WASTE OIL & WATER	11-2-91			G	G	G	F				
CRUSHED DRUMS	EMPTIES	NA			G	G	G	F	20 YDS ³	20 YDS ³ /MONTH	3-17-92	RECENT CID INDIANAPOLIS, IN

NO* responses must be explained in narrative.

NARRATIVE

Heritage Environmental Services (HES) is currently operating two divisions at the Lemont facility. The first of these is the Treatment Plant which includes the storage and treatment of hazardous wastes. The second division is Petroleum Management, whereby HES picks up waste oil from off-site generators on a multi-stop permit. The transportations at HES are a part of the Petroleum Management division, however manifests are kept at HES's Indianapolis, IN facility.

Industrial oils are accepted from off-site generators and processed to produce waste oil fuel. Approximately 90% of the fuel is on-spec and shipped to facilities such as Ameropan- Chicago, IL and North Vernon Forge- North Vernon, IN. The remaining 10% of fuel is off-spec and either mixed with the hazardous waste fuel or sent to HES in Indianapolis, IN for treatment along with residual water and the rag layer (oil/water).

Low flash wastewaters are treated by de-watering or separating the phase layers. The fuel layer is blended into hazardous waste fuel while the non-hazardous waste is shipped to HES in Indiana for treatment.

Inks, paints, and solvents are accepted for hazardous waste fuel blending. Fuel with acceptable BTU value is shipped to cement kilns such as Systech- Greencastle, IN and Continental Cement- Hannibal, MO. Residual sludge and strainer cleanings from this process are shipped to an off-site incinerator as hazardous waste.

HES receives drums of waste for temporary storage from off-site generators. These wastes are mainly corrosives, plating wastes and other inorganic wastes. These, along with heavy hazardous waste fuels which cannot be treated on-site, are shipped to HES in Indiana for treatment.

Lab packs are also accepted by HES from off-site generators. These wastes are temporarily stored prior to shipment off-site for incineration or treatment.

HAZARDOUS WASTES GENERATED

Hazardous waste fuel- F001-5, K086, D00X, Varies- Produced from ignitable hazardous waste and non-hazardous waste oil. Approx 1 million gallons/year generated and shipped to Continental Cement- Hannibal, MO or Systech- Greencastle, IN (cement kilns); or OHM- Georgia (fuel blending). About 45,000 gallons currently on-site.

Waste petroleum naphtha- D001- From 2 parts washers. Approx 144 gallons/year generated and blended into hazardous waste fuel on-site.

Waste Flammable Solids- F001-S, F001-SX19, F001-CX19 generated from strainer cleanings from secondary fuel blending. Approx 40,000 pounds/quarter generated and shipped to Rollins Environmental- Baton Rouge, LA. About 5,000 pounds currently on-site.

Lab packs- Various waste codes- Approx 40 drums/month generated and shipped to HES- Indianapolis, IN. 80 drums currently on-site.

Listed hazardous water- Various waste codes- Hazardous wastewater from off-site generators. Approx 20,000 gallons/year generated and shipped to Rollins Environmental- Baton Rouge, LA. None currently on-site.

Temporary storage waste- Various waste codes- Mainly inorganic wastes not treated on-site. Approx 80 drums/month generated and shipped to Chemical Waste Management- Emelle, AL. 100 drums currently on-site.

NON-HAZARDOUS WASTES GENERATED

Waste solids- Tank bottoms, soil, plastic and steel drums. Approx 100 cubic yards/quarter generated and shipped to CID Landfill- Calumet City, IL. 20 cubic yards currently on-site.

Waste oil & oil/water mixtures- Waste that cannot be treated on-site. Over 1 million gallons/year generated and shipped to HES- Indianapolis, IN. About 130,000 gallons on-site.

Treatment water- Reaction water from the separation of waste oil and water. Amounts included with above wastestream.

HAZARDOUS WASTE UNITS

SU1- Container Storage

Area 1- Container Storage/Processing Building
Concrete foundation with coated storage bays
Capacity- 456-55 gallon drums + 1-220 gallon Tote = 25,300 gals

Area 2- Diked Concrete Pad
Capacity- 260-55 gallon drums = 14,300 gals

Area 3- Van Trailers (10)
Capacity- 800-55 gallon drums = 44,000 gals

S02- Tank Storage

Tanks are located in a tank farm with a concrete floor and walls

VRT 1-4 Initial vacuum receiving tanks

CB 1-4 Cone bottom gravity separation tanks

SF 1-7 • Supplemental fuel storage tanks

T01- Treatment in Tanks

Tanks are located in a tank farm with concrete floor and walls
HT 1-5 Oil/hydrocarbon heat treatment tanks

T04- Other

Not occurring at the time of this inspection.

VIOLATIONS

722.134(a)(3)- Words "Hazardous waste" were not marked on portable vacuum receiving unit.

725.173(b)- Discrepancy in operating record. Actual number of drums in diked area did not match amount on inventory sheet.

Both of the above violations were resolved during the inspection.

NOTES

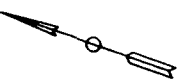
- 1- It appears from information in past inspection reports that HES is operating in compliance with a CAFO issued on 9-26-85.
- 2- On 1-6-92 HES implemented their contingency plan in response to a small fire in the new drum storage and processing building. No injuries and minimal property damage occurred. No waste materials were involved since this structure was not yet in use. A report was submitted to the Agency in compliance with 35 IAC 725.156(j).
- 3- At the time of this inspection, Heritage Environmental Services is operating as a fully regulated generator as well as a treatment and storage facility.

CHICAGO SANITARY DRAINAGE AND SHIP CANAL 3-20-92

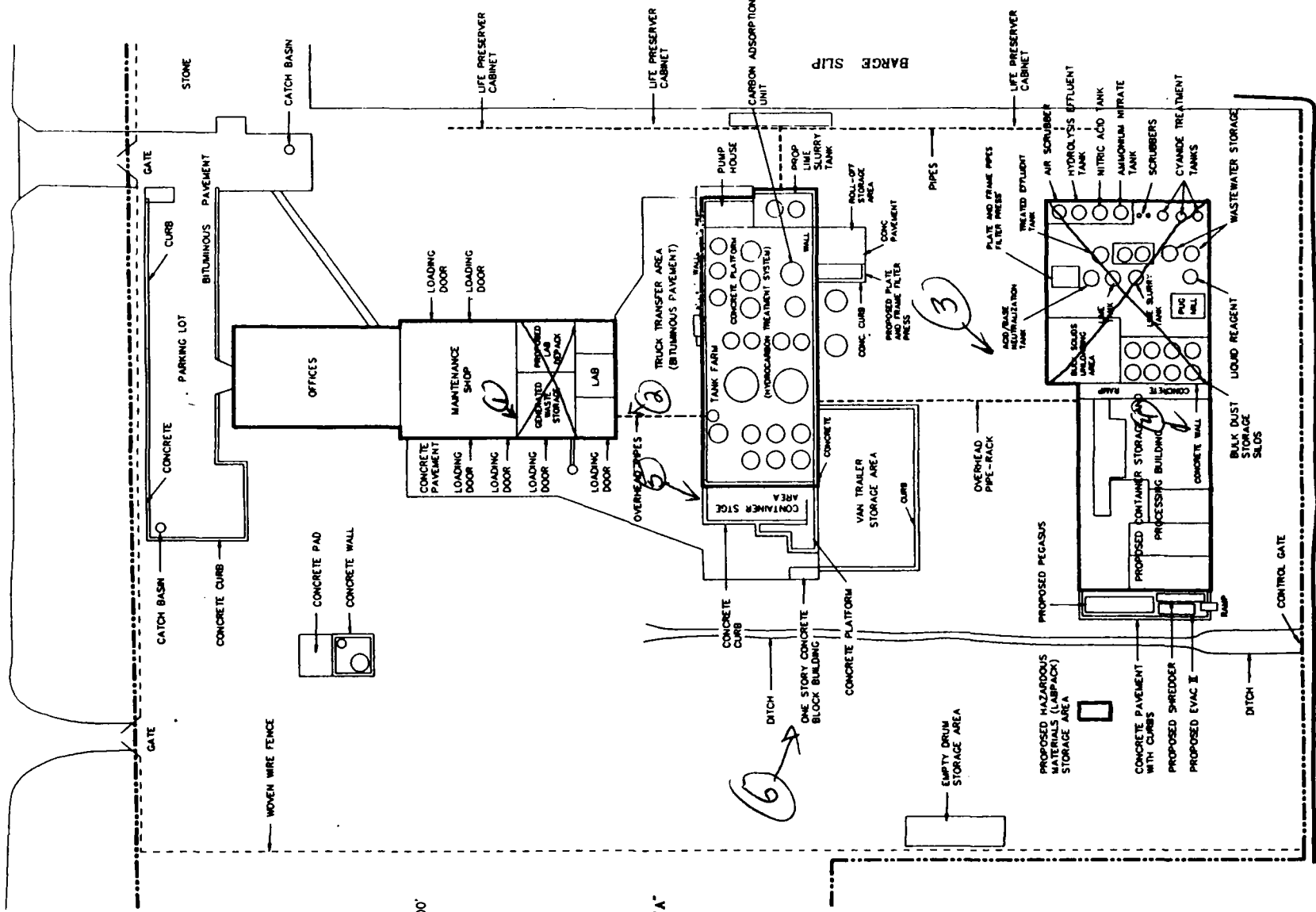
201162007

DIKE ROAD

NORTH



PARCEL "A"



HERITAGE ENVIRONMENTAL SERVICES, INC.			
LONDON, KANSAS			
SITE PLAN OF STORAGE TREATMENT FACILITY			
REVISED			
HERITAGE REMEDIATION/ENGINEERING			
DESIGNED BY	J. HAYLER	DATE	MAY 17, 1991
APPROVED BY	G. DAVENY	SCALE	AS SHOWN
			2115

RE
JU
IEI

Illinois Environmental Protection Agency Photographs

Name: HERITAGE ENVIRONMENTAL SERVICES Site #: 0311620007

: 3-70-92 Time: 930AM-130PM Photograph By: JAMES HAENNICK



Comments: S - DIKEED CONCRETE PAD (SOI)

Roll #: 92-284 Photo #: 5



Comments: E - VAN TRAILERS - 10 (SOI)

Roll #: 92-284

Photo #: 6

Illinois Environmental Protection Agency Photographs

Site Name: _____ Site #: _____

Date: _____ Time: _____ Photograph By: _____



Comments: 5 - NEW CONTAINER STORAGE/PROCESSING BUILDING (501)

Roll #: 92-284 Photo #: 3



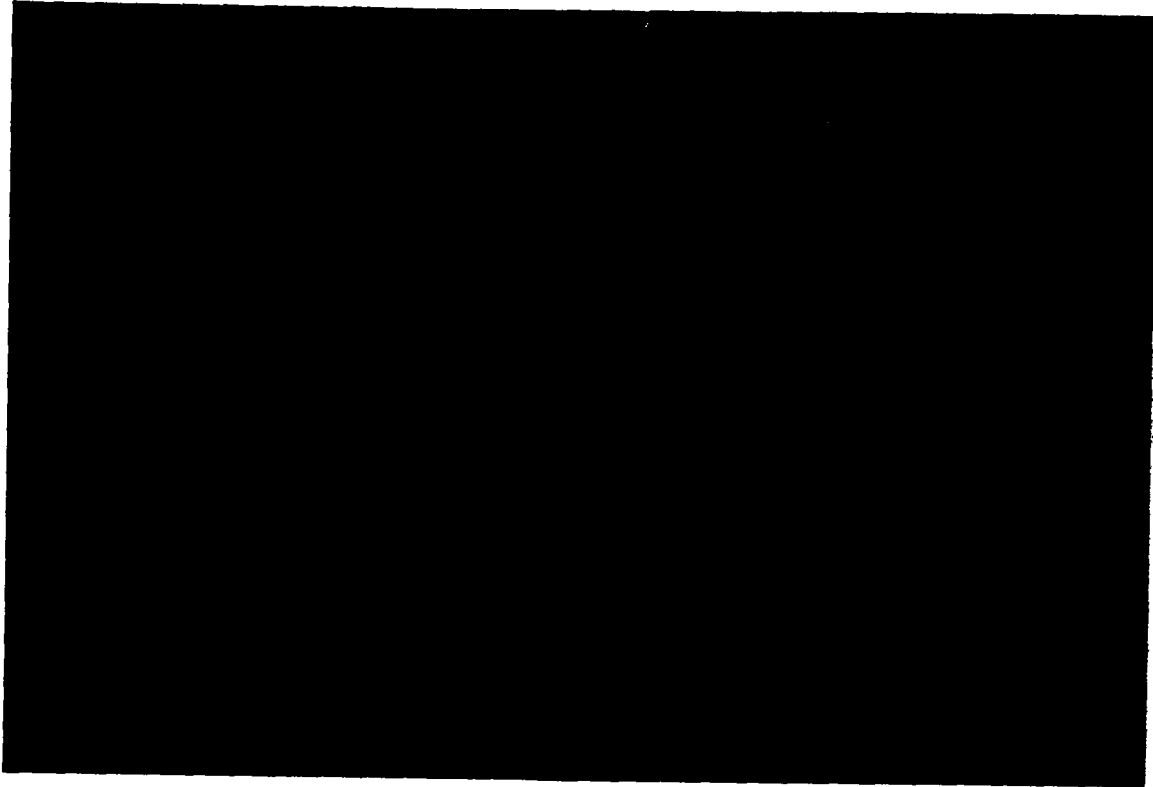
Comments: 5 - INSIDE CONTAINER STORAGE/PROCESSING BUILDING (501)

Roll #: 92-284 Photo #: 4

Illinois Environmental Protection Agency Photographs

Site Name: 10815-02 ENVIRONMENTAL SERVICES Site #: 92-284-1

Date: 3-70-92 Time: 930AM-130PM Photograph By: JAMES HANNICKLE



Comments: S - 2 PARTS WASHERS

Roll #: 92-284 Photo #: 1



Comments: NW - PORTABLE VACUUM RECEIVING UNIT - WORDS 'HAZARDOUS'

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	<input checked="" type="checkbox"/>			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

IEPA/DLPC

- 8 APR 1992

RECEIVED

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____ Is the facility only operating with a RCRA permit? Yes _____ No _____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			✓	NOT A NEW FACILITY
OTH	1				Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <input checked="" type="checkbox"/> No _____ N/A _____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	✓			


PER-C-2


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1			Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it gener- ates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facili- ties that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements				
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>NO BULK SHIPMENTS BY WATER OR RAIL</p> <p>↓</p>

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				NO WASTE READY FOR TRANSPORTATION OFF SITE 
OTH	1	X		Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____			✓	
				b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.	✓			GENERATOR IS ALSO A TRANSPORTER; OTHERWISE, TRANSPORTER SUPPLIES PLACARDS
OTH	1	X		Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	✓			NO ACCUMULATION OUTSIDE PERMITTED STORAGE AREAS 

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:	✓			
			a	- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NONE REQUIRED
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO REQUESTS BY DIRECTOR

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time	✓			
				<p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes ____ No ____ <i>NA</i></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No ____ <i>N/A</i></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes ____ No <input checked="" type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input checked="" type="checkbox"/> No ____</p>				


RESERVED
ON-SITE

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	✓			
MAN	1			Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			✓	NO EXCEPTION REPORTS REQUIRED 

GEN-D-2

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>				<p>↓ NO ADDITIONAL REPORTS REQUIRED</p>
					<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>			✓	

GEN-D-3

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No <u>✓</u> NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.			✓	NO EXPORTS OF HAZARDOUS WASTE 

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			<input checked="" type="checkbox"/>	NO IMPORTS OF HAZARDOUS WASTE
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
			b2	Has the importer or his agent signed the manifest in place of the generator; and				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				


GEN-F-1

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2	X		PART 722 GENERATOR STANDARDS Subpart G: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>				✓ NO FARMING ACTIVITY

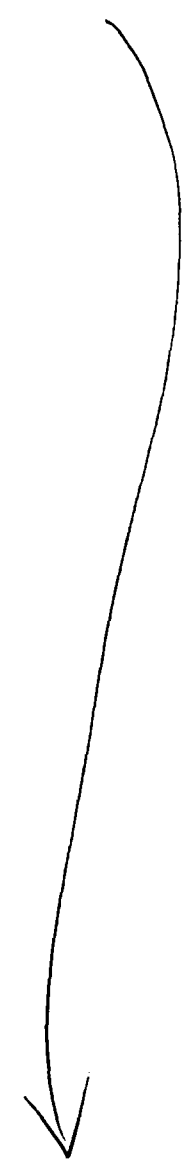
GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes _____ No <input checked="" type="checkbox"/> Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes <input checked="" type="checkbox"/> No _____				
					NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form. Section 723.111: USEPA Identification Number	<input checked="" type="checkbox"/>			
				a	Has the transporter obtained a USEPA identification number?				
OTH	1				Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste:	<input checked="" type="checkbox"/>			
					- For a period of 10 days or less? Yes _____ No <input checked="" type="checkbox"/>				
									FUEL BLENDING - TRANSPORTER IS ALSO A TREATMENT FACILITY
									TRANSPORTER IS ALSO A STORAGE FACILITY


Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1/2			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping				TRANSPORTEER MANIFESTS ARE KEPT AT HES IN INDIANAPOLIS 
				Section 723.120: The Manifest System				
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes ____ No ____				
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> - Signed and dated the accompanying manifests? Yes ____ No ____ - Returned a signed copy to the generator before leaving the generator's property? Yes ____ No ____ 				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes ____ No ____				
d	Has the transporter who delivers hazardous waste to another transporter or to the designated facility:							

TR-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes ____ No ____				
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes ____ No ____				
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes ____ No ____				
			e	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ____				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes ____ No ____ N/A ____				
			g	Has the transporter who transports hazardous waste out of the United States:				
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes ____ No ____				
				2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes ____ No ____				


TR-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1.			3) Apparently returned a signed copy of the manifest to the generator? Yes ____ No ____ 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes ____ No ____				
				Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes <input checked="" type="checkbox"/> No ____ NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes ____ No <input checked="" type="checkbox"/> AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND	✓			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p style="text-align: center;">AND</p> <p>4) The date the waste is accepted? Yes ____ No ____</p> <p style="text-align: center;">AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes ____ No ____</p> <p style="text-align: center;">AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes ____ No ____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes <input checked="" type="checkbox"/> No ____</p> <p style="text-align: center;">OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p>				

TR-B-4

Area	Class	90 Day F.U. Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr Sub Sec		Yes	No		
			d	<p>Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				<p>NO SHIPMENTS OUTSIDE THE U.S.</p> <p>NO UNRESOLVED ENFORCEMENT ACTION</p> <p>NO REQUESTS BY DIRECTOR</p>
			e	<p>Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
				<p>OR</p> <p>e If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges Section 723.130: Immediate Action a Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ____ No ____ c Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes ____ No ____			✓	NO DISCHARGES FROM TRANSPORT VEHICLE 
OTH	1	X		Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> - Clean-up the discharge? Yes ____ No ____ - Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ____ No ____ 			✓	


TR-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
OTH		X		Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	✓			
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH		X		Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> and				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		b	<p>Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		c	<p>Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		d	<p>For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		f	<p>Has the marketer kept a copy of each certification, sent or received, for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used Oil Burned for Energy Recovery Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery	<input checked="" type="checkbox"/>			
			b1	Has the marketer conducted an analysis of the used oil? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: If "No", then Subpart E applies. Does the oil exceed any of the specifications listed in 726.140(e)? <i>10% OFF TIME</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>				
				NOTE: If "No", then Subpart E does not apply except for 726.143(b)(1) and (b)(6).				
	I		b2	Does the marketer only market the off-specification used oil to burners that have: notified USEPA of their used oil activities, have USEPA ID #, and have the proper combustion devices pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b3	Has the marketer re-notified USEPA as to used oil manage- ment activities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b4	Does the marketer have an invoice system such that re- ceiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	II		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				FACILITY DOES NOT BURN USED OIL 
	II		b6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery			<input checked="" type="checkbox"/>	
				NOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.				
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b	Has the proper notification been given to USEPA? Yes <input type="checkbox"/> No <input type="checkbox"/>				
				NOTE: Explain your response in the remarks column.				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
	II		c	Has the burner provided to a marketer, before accepting any off-specification oil, the one-time signed certification notice? Yes ____ No ____ N/A ____				
			d	If the burner blends off-specification oil so that it now meets specifications, have analyses been done? Yes ____ No ____ N/A ____				
	II		e	Is the burner maintaining the proper records for three years (invoices, analysis, certification notices)? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comments
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <input checked="" type="checkbox"/> NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No _____ <i>N/A</i> <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			FACILITY DOES NOT MANAGE THESE WASTES

TSD-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
OTH	1			Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	✓			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A ✓			✓	NO WASTE RECEIVED FROM FOREIGN SOURCE
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ✓ No ___ N/A ___				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ___	✓			

TSD-B-1

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				GENERATOR PROVIDES PRE-ACCEPTANCE INFO. REVIEWED AND FULLY TESTED IF NECESSARY EV. INFORMATION OBTAINED HAS QA/QC ANALYSIS DONE ON HAZ. WASTE.
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - <u>725.293 (Tanks);</u> - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				
OTH	1	X				<input checked="" type="checkbox"/>			

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b	<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ___ No <input checked="" type="checkbox"/></p> <p>OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No ___</p>				
			c	<p>Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No ___</p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	2				<p>Section 725.115: General Inspection Requirements</p> <p>Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:</p> <p>1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the schedule specify at least the following minimum inspection frequency:</p> <p>- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-7

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<ul style="list-style-type: none"> - A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
				<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					e Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
					a Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					a Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or commingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes _____ No _____ N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
					NOTE: A "Yes" answer is a violation of the location standard.				

TSD-B-12

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X			Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			ALTRM PA SYSTEM

TSD-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			FIRE EXTINGUISHERS SPILL STATIONS SAFETY SHOWERS
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:				
				- Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				WEEKLY
				- Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				MONTHLY
				- Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				WEEKLY
				- Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				↓
				NOTE: Any "N/A" answer must be explained in the Comments.				

TSD-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			THERE IS ALWAYS MORE THAN ONE EMPLOYEE ON SITE DURING OPERATING HOURS
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
				Sub Sec		Yes	No		
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				<p>LEMONST POLICE & FI.</p> <p>COOK G. SHERIFF</p> <p>ILL. ESD.4</p> <p>TYPICALLY, LEMONST PERSONNEL WOULD RESP.</p> <p>SILVER CROSS HOSPITAL in JOLIET</p> <p>BOLING BROOK HOSPITAL</p> <p>NO REFUSALS</p>
					<p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

TSD-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				
				Section 725.151: Purpose and Implementation of Contingency Plan	✓			
			a	Is a plan available? Yes <u>✓</u> No <u> </u>				
				NOTE: If the answer is "No", skip to 725.155.				
OTH	2			a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <u>✓</u> No <u> </u>				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <u>✓</u> No <u> </u> N/A <u> </u>				
				Section 725.152: Content of Contingency Plan	✓			
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <u>✓</u> No <u> </u> 2) Explosions? Yes <u>✓</u> No <u> </u>				

TSD-0-1

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No	
			Sub Sec		Yes	No			
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
				Section 725.153: Copies of Contingency Plan					<input checked="" type="checkbox"/>
			a	Has a copy (and all revisions) of the contingency plan:					
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					

TSD-D-3

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			725.154: Amendment of Contingency Plan	<input checked="" type="checkbox"/>			PLAN HAS NOT FILLED
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH	2		d	4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.155: Emergency Coordinator	<input checked="" type="checkbox"/>			
				Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	✓			
							<p>9-1-88 SHREDDER EXPLOS.</p> <p>SEE MARCH 1989 INSPECTION REPORT</p> <p>2 MINOR RELEASES</p> <p>1-6-92 SMALL RELEASE</p> <p>SEE MARCH 1991</p>	

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:	✓			
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the facility initiate shipments of hazardous waste? Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>	<input checked="" type="checkbox"/>			NO SHIPMENTS BY WATER OR RAIL
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes <input checked="" type="checkbox"/> No _____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes <input checked="" type="checkbox"/> No _____</p>				


TSD-E-2

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
			a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Does the operating record contain the following information:				
			1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			3)	The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			4)	The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				


OF CONTAINERS
DISCLOSED
SOI W.
FARM - RE...
INSPECTED

NOT A DISPOSAL FACIL


TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <u>✓</u> No <u> </u> N/A <u> </u></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <p>- 725.113 (Gen. Waste Analysis)? Yes <u>✓</u> No <u> </u></p> <p>- 725.293 (Tanks)? Yes <u>✓</u> No <u> </u> N/A <u> </u></p> <p>- 725.325 (Surface Improvements)? Yes <u> </u> No <u> </u> N/A <u>✓</u></p> <p>- 725.352 (Waste Piles)? Yes <u> </u> No <u> </u> N/A <u>✓</u></p> <p>- 725.373 (Land Treatment)? Yes <u> </u> No <u> </u> N/A <u>✓</u></p> <p>- 725.441 (Incinerators)? Yes <u> </u> No <u> </u> N/A <u>✓</u></p> <p>- 725.475 (Thermal Treatment)? Yes <u> </u> No <u> </u> N/A <u>✓</u></p> <p>- 725.502 (Chem., Phys., Bio. Treatment)? Yes <u> </u> No <u> </u> N/A <u>✓</u></p> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <u>✓</u> No <u> </u> N/A <u> </u></p>				<p>THESE METHODS NOT EMPLOYED BY FACILITY</p> 

TSD-E-4

Area	Cis	ay F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.				
					10) Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NOTE: Data required under 725.194 must be kept throughout the post-closure period.				THESE DATA NOT REQUIRED 

TSD-E-5


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			NOT A DISPOSAL FACILITY
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.174: Availability, Retention and Disposition of Records				
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				NOT A DISPOSAL FACIL. 
	b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION OR REQUESTS BY DIRECTOR		

TSD-E-6



Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
OTH	1			Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	<input checked="" type="checkbox"/>			
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
CLO	1			a	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				
					Section 725.212: Closure Plan	✓			
					Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				FACILITY IS NOT GOING THROUGH CLOSURE 
					Was the closure plan submitted to the Agency within the time frames specified below:				
					- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 				 NOT REQUIRED 
				Section 725.218: Post-Closure Plan a Was the most current facility post-closure plan available during the inspection? Yes _____ No _____ Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes _____ No _____ N/A _____			<input checked="" type="checkbox"/>	
FIN	1			Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	<input checked="" type="checkbox"/>			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? NOTE: If no post-closure plan, mark "N/A".			<input checked="" type="checkbox"/>	NOT REQUIRED

TSD-G/H-2

Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
				Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	✓			
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	✓			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Are containers of hazardous waste being opened, handled or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	✓			
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	✓			


TSD-I-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	✓			

TSD-I-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. NOTE: Tanks or sump pits that serve as part of a second- ary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input type="checkbox"/> NOTE: Failing the filter test means that the waste contains free liquids.	<input checked="" type="checkbox"/>			LIQUID WASTE STORED IN TANK FARM OUTSIDE
			a	Section 725.291: Assessment of Existing Tank Systems For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				

TSD-J-1


Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1		b		<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				<p>NO NEW TANKS</p> 
			a		<p>Section 725.292: Design and Installation of New Tank Systems or Components</p> <p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>				

TSD-J-2


Area	Class	Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				<div style="text-align: center;">↓</div> AGE OF TANKS IS UNKNOWN - SECONDARY CONTAINMENT IS ANTICIPATED BY 1995
				Section 725.293: Containment and Detection of Releases	✓			
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A ✓				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A ✓				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes _____ No _____ N/A ✓				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ✓ No _____ N/A _____ or If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No _____ N/A ✓				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNDERGROUND TANKS 


TSD-J-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			MANUAL INSPECTIONS DURING FILLING NO UNCOVERED TANKS NO LEAKS OR SPILLS
OTH	2			Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspections as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).			<input checked="" type="checkbox"/>	NO LEAKS OR SPILLS 

TSD-J-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ____ No ____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____</p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p>				

TSD-J-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p>				 <p>FACILITY NOT GOING THROUGH CLOSURE</p>
				<p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>				
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p>				
				<p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

TSD-J-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to Section 725.299. a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes. b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 725.299: Special Requirements for Incompatible Wastes Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	INCOMPATIBLES ARE NOT STORED IN THE SAME TANK

TSD-J-9

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.300: Waste Analysis and Trial Tests</p> <p>In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:</p> <p>a 1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____</p> <p style="text-align: center;">or</p> <p>b 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____</p> <p>NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.</p>			✓	TANKS NOT USED TO STORE SIGNIFICANTLY DIFFERENT WASTES

TSD-J-10

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: HERITAGE ENVIRONMENTAL SERVICES
 U.S. EPA ID No.: 140085349264 0311620007
 Street: CANAL BANK ROAD NE
 City: LEMONT State: IL Zip: 60439
 Telephone: 708 739 1151

Inspection Date: 3/20/92 Time: 930A-130PM
 Weather Conditions: 20°F

Inspectors:

Name	Agency/Title	Telephone
JAMES HAENNICK	EPA/EPS	7085315900

Facility Representatives: BOB GARCIA PLANT MGR 708 739 1151

See Appendix B to determine which of the following LDR waste categories the facility manages

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F020-F023 and F026-F028	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
California List*	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
First Third [40 CFR 268.10]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Second Third [40 CFR 268.11]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Third Third [40 CFR 268.12]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- FUEL BLENDING OF HAZ WASTE W/ WASTE OILS
- RE-PACKAGING OR RE-MANIFESTING HAZ WASTES
ACCEPTED FROM OFFSITE GENERATORS

LDR Waste Management:

ALL LDR WASTES SHIPPED OFF-SITE FOR
TREATMENT OR INCINERATION

Summary:

NO LDR VIOLATIONS

Signature:

James Hamill

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
F001 THROUGH F005 SPENT SOLVENTS
2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):
VARIOUS WASTE CODES POSSIBLE
4. First Third Wastes [40 CFR 268.10]:
VARIOUS WASTE CODES POSSIBLE
5. Second Third Wastes [40 CFR 268.11]:
VARIOUS WASTE CODES POSSIBLE
6. Third Third Wastes [40 CFR 268.12]**:
VARIOUS WASTE CODES POSSIBLE

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (35 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ☒ No ☐

If no, list below:

<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern includes California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and X wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒

List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒

List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒

List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒

List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒

List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☒ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>F001</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>↓</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>F005</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCVE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
VARIOUS	_____	_____	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	_____	_____	<input checked="" type="checkbox"/>
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☒ No ☐ NA ☐

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ☐ No ☒ NA ☐

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

☐ Organometallics: 40 Part 268, Appendix IV constituents
☐ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ☐ No ☐ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ 50 to 500 ppm PCBs
☐ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☒ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
_____	_____	____/____/____
_____	_____	____/____/____
_____	_____	____/____/____

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☒ NA ☐

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☒ No ☐

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☒ No ☐

Comments RESTRICTED WASTES ARE MIXED VIA FUEL BLENDING

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

ALL INCOMING WASTES - LISTED WASTES * FROM
INFORMATION PROVIDED BY GENERATORS

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

[40 CFR 268.7(a)(5)]

HAZARDOUS WASTE FUEL
LAST TCLP TEST: ~~2-11-92~~ 2-11-92

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?

Yes ☐ No ☒ NA ☐

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.) F001-F005, etc.

List the wastes LISTED WASTES IN FUEL BLENDING

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments INCINERATION; FUEL BLENDING

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonhazardous), D002, and D003(except cyanides and sulfides). [55 FR 22666].

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ☐

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments FACILITY HAS INTERIM STATUS FOR TREATMENT, STORAGE

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix B.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
<u>VARIOUS</u>	<u>HES - INDIANAPOLIS</u>
<u>↓</u>	<u>TWE - SAUGET, ILL.</u>
<u>↓</u>	<u>ROLLINS - LOUISIANA</u>
	<u>OHM - GEORGIA</u>
	<u>CWM - ILLINOIS</u>

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☒ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ☐ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes _____ No _____

b. Is a notification sent with each waste shipment?

Yes _____ No _____

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes _____ No _____ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
01	01
02	02
03	03
04	04
05	05
06	06
07	07
08	08
09	09
10	10
11	11
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99	99

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement?
[40 CFR 268.7(a)(9)]

Yes _____ No _____

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision?

Yes No NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes No ✓ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>

- 2 Are treatment residuals generated from these units?**

Yes _____ No _____

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes No NA

(If yes, the TSD checklist must also be completed.)

E Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ☒ No ☐

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ☒ No ☐

(If yes, the Generator checklist must also be completed.)

WASTES OF DIFFERENT DOT SHIPPING DESCRIPTIONS ARE
 MIXED IN THE FUEL BLENDING PROCESS

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ☐ No ☐

Comments _____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ☐ No ☐ NA ☐

(If Yes, the TSD checklist must also be completed.)

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
California List Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? 2/1/91

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☒ Generator provides data
☒ Facility performs analyses in on-site laboratory QA/QC
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes: ☒ No ☐ NA ☐

If analyses are conducted off site, identify lab: EMS LABS - ROMEOVILLE, ILL.

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☒ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

Does the documentation discussed in points 2 and 3, reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☐ No ☐ NA ☒

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☒ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ☐ No ☐

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ☐ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ☐ No ☐

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ☐ No ☐

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☒ No ☐ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ☐ No ☒ NA ☐ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ☒ No ☐ FUEL BLENDING

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ☐ No ☐ NA ☒

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
VARIOUS	CHEMICAL & PHYSICAL
↓	SEPARATION FOLLOWED BY
	FUEL BLENDING

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ☒ No ___ (If No, go to c.)

List the wastes LISTED SOLVENTS & DODGE WASTES (FUEL BLENDING)

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ___

If yes, is this method used for the aggregated wastes?

Yes ☒ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ☒

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☒ No ☐

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☒ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☐ No ☒ (If No, go to 10.) ONLY NON-HAZARDOUS
TANK BOTTOMS

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☐ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☒ No ☐ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>VARIOUS</u>	<u>HES. - INDIANAPOLIS</u>
<u>↓</u>	<u>OHM - GEORGIA</u>
<u>↓</u>	<u>ROLLINS - LOUISIANA</u>

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ☒ No ☐

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ☐ No ☐

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ☐ No ☐ NA ☐

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ☐ No ☐

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

TSD

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(b)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix B.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste CodeReceiving Facility

VARIOUS

HES - INDIANAPOLIS, IND.

1

TWE - SAUGET, IL.

1

ROLLINS - LOUISIANA

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☐ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

N/A 5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ☐ No ☐ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

6. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

List the wastes LISTED SOLVENTS + IGNITABLE WASTES

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments INCINERATION, FUEL BLENDING

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [35 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes No ✓

Comments _____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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RCRA INSPECTION REPORT

TYPE OF FACILITY**TYPE OF INSPECTION**

NON-REGULATED STATUS

PART A

PART B PERMIT APPLICATION

ENFORCEMENT

ORDERS ISSUED

TSD FACILITY ACTIVITY SUMMARY

IL 532-1834
- PG 224 (12/89) Page 1

OWNER**OPERATOR**

Name	M W R D	Name	Heritage Environmental
Address	100 E. Erie	Address	Canal Bank Rd., NE
City	Chicago	City	Lemont
State	IL	State	IL
Zip	60611	Zip	60439
Phone #	312/675-3099	Phone #	708/739-1151

PERSON(S) INTERVIEWED**TITLE****PHONE #**

Bob Garcia	Plant Manager	708/739-1151

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Chuck Grootman	ICPA / EPS	708/531-5900

PREPARED BY**AGENCY/TITLE****PHONE #**

Chuck Grootman	ICPA / EPS	708/531-5900
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

HAZARDOUS

WASTE DISPOSITION FORM

Facility: Heritage Environmental
 USEPA #: IL D085349264
 IEPA #: 0311620007

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #				On Annual Report for: (Circle if present; cross out if not present)				Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 90	* 19 89	* 19 88							
Waste Petroleum Naphtha	parts washer	Doos	Y	Y	G	F	G	F	G	F	One parts washer - no accumulation ≈ 15 gal/month	—	blended into Haz Waste fuel on site.	
					G	F	G	F	G	F				
Haz. Waste Fuel	waste blending	926-90 Fuel ↓ Fuel ↓ Kool ↓ D-metals	Y	Y	G	F	G	F	G	F	50,000 gal/month	3-12-91	Cement Kilns Systech or Continental Cement	
					G	F	G	F	G	F		2-25-91	TWI as fuel for incinerator	
Waste flam. Solids	soil clean-ups paint solids	Fuel ↓ Fuel ↓ Doos	Y	Y	G	F	G	F	G	F	≈ 50,000 gal/year	2-11-91 1-24-91	OHM for Treatment Cwm / Rollins incinerator	
					G	F	G	F	G	F				
List, Haz Water	water contaminated with listed wastes	Fuel ↓ Fuel ↓ & others	Y	Y	G	F	G	F	G	F	≈ 20,000 gal/year		Rollins for incineration	
					G	F	G	F	G	F				
Lab packs & other stored HAZ. waste	Storage of waste for others	Any	Y	Y	G	F	G	F	G	F		2-27-91	TWI / Ensco incinerator H.E.S. for treatment	
					G	F	G	F	G	F				

* All "NO" responses must be explained in narrative.

NON-HAZARDOUS

WASTE DISPOSITION FORM

Facility name: Heritage Environmental
 USEPA #: IL D085349264
 IEPA #: 0311620007

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19	* 19	* 19					
Solios	Tank bottoms Soil clean-up	—	—	—	—	G	G	G	20 cy. quarter		H.E.S. for Treatment CID for Landfill	
						G	G	G				
						F	F	F				
Waste oil	8-30-90	—	—	—	—	G	G	G		2-28-91	H.E.S. for Treatment	
						F	F	F				
						G	G	G				
						F	F	F				
Treatment waters	Contaminated water from H.E.S. & others	9-26-90	—	—	—	G	G	G		3-12-91	H.E.S. for treatment Breslube - Treatment	
						F	F	F				
						G	G	G				
						F	F	F				
Crushed metal drums	bulking waste	—	—	—	—	G	G	G			U.S. Steel for recycling.	
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				

* All "NO" responses must be explained in narrative.

NARRATIVE

Heritage Environmental Services, Inc. (H.E.S.) generates, stores, and treats hazardous waste. The operations at this location are divided into separate units - Transportation, Petroleum Management and the Treatment Plant.

The Transportation unit transports hazardous and non-hazardous waste for H.E.S. and its customers. Petroleum Management (which is actually part of Transportation) utilizes a multi-stop permit to pick up non-hazardous waste oil from automotive service garages. The Treatment Plant stores and treats hazardous and non-hazardous waste from off-site generators.

H.E.S. reclaims/recycles waste oil and hazardous waste mixtures. Hazardous waste fuel (subject to Part 726) is produced from ignitable hazardous wastes by separating phases within the wastes and by blending various waste streams. H.E.S. also produces on-spec waste oil fuel by using heat and chemicals to separate the oil from contaminants, such as water.

One of H.E.S.'s minor activities includes providing temporary container storage of hazardous waste lab packs and hazardous waste evidence for the Drug Enforcement Administration. The containerized wastes are placed in semi-trailers until arrangements for off-site disposal (incineration) can be made.

Hazardous Wastes Generated

Hazardous Waste Fuel - F001-F005, D001, K086 & D-Metals - a mixture of ignitable hazardous waste and minimal amounts of non-hazardous waste oil from off-site generators. Sent to cement kilns (Systech, IN and Continental Cement, MO) and TWI incinerator for use as fuel.

Waste Petroleum Naphtha - D001 - spent solvent from one parts degreaser owned and serviced by H.E.S. Blended into hazardous waste fuels on site.

Waste Flammable Solids - D001, F001-F005 - spill pads and contaminated soil from H.E.S. Remediation Engineering's off-site service activities, strainer cleanings from secondary fuel blending process, and paint solids from other generators' waste. Sent to OHM (GA) for fuel blending or, if less than 5000 BTU, incinerated at CWM (IL) or Rollins (LA).

Listed Hazardous Water - F001-F005 & Others - from bulking of off-site drums of water contaminated with listed hazardous wastes. Sent for incineration at Rollins (LA).

Lab packs and other wastes received for storage but treated elsewhere - any EPA HW # - received from off-site clean-up projects such as school chemistry labs. Also DEA confiscated wastes. Sent to H.E.S. (IN) for treatment, TWI (IL) for incineration, or Ensco (AR) for incineration.

Non-Hazardous Wastes Generated

Solids - Non-hazardous tank bottoms, soil clean-ups, cut up plastic drums, or waste from other generators. Sent to CID landfill (IL) or H.E.S. (IN) for treatment.

Waste Oil - Non-hazardous loads of waste oil that are too difficult to completely treat at this location. Sent to H.E.S. (IN) for further treatment.

Treatment Water - other generators' contaminated wastewater or reaction water from the phase separation of waste oil and water. Sent to H.E.S (IN) or Breslube (IN) for treatment.

Crushed Empty Drums - RCRA empty metal containers are crushed and sent to US Steel for use in their furnaces to recover the steel.

Hazardous Waste Units

Container Storage - S01 - containers are stored on a diked, concrete pad and in several locked semi-trailers. Incompatibles are stored in separate trailers or on opposite ends of the concrete pad.

Tank Storage - S02 - Storage tanks are located on a concrete pad with concrete walls. The tank farm includes initial receiving tanks (VRT 1 - VRT 4), cone bottom gravity separation tanks (CB 1 - CB 4) and product (blended hazardous waste fuel) storage tanks (SF 1 - SF 6 and SF 7 which was called OS 2 before).

Treatment Tanks - T01 - Heat treatment/chemical separation occurs in tanks HT 2 - HT 5). Tank HT 1 has not been used for hazardous waste but is used for recycled fuel oil, per Garcia.

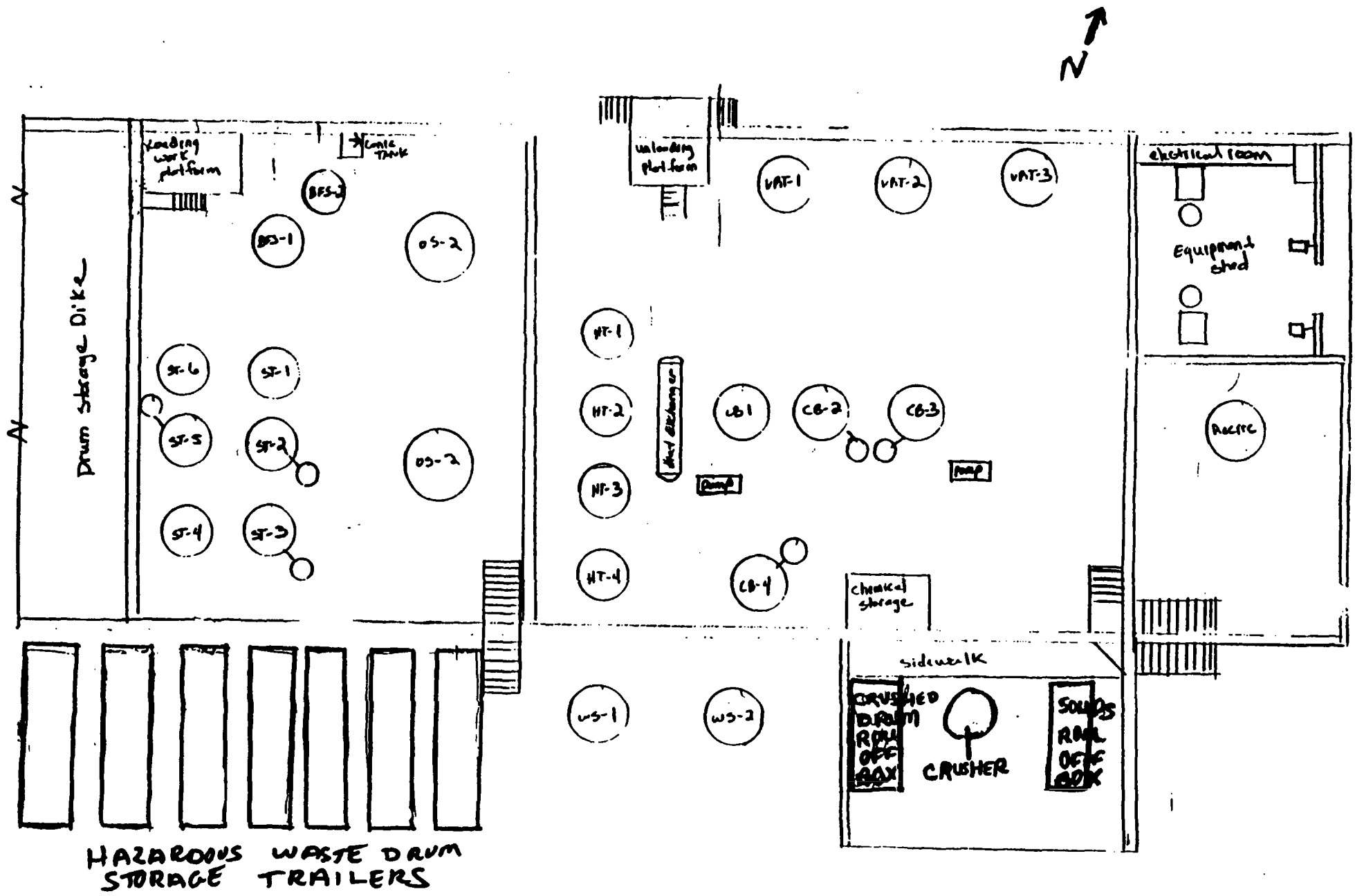
Treatment in containers - T04 - was not occurring.

No apparent violations were noted during this inspection. Violations identified during the last inspection on September 28, 1990 were resolved.

Resolved Apparent Violations

- 725.294 - No level sensing devices on hazardous waste storage tanks
 - contact with RCRA Hotline and EPA Region V supports the
 H.E.S. position that a "manual" system complies with the
 regulations.
- 728.150(a)(2) - No accumulation dates on LDR containers in storage - dates
 present.

CJG:fs:33



DIKE

IEPA-DLPC

PARCEL "A"

STORAGE TREATMENT	EFF. ELEMENT
	DATE

Scale in Feet

NOIS ENVIRONMENTAL
ACTION AGENCY PHOTOGRAPHS

DATE: March 22, 1991

TIME: 8:30 am to 5:00 pm

SITE NAME: HERITAGE ENVIR.

SERVICES

SITE #: 0311620007

COUNTY: Cook

COMMENTS: FACING SE

TANK farm

PHOTOGRAPH BY:

P CHARLES J. GRUNTMAN

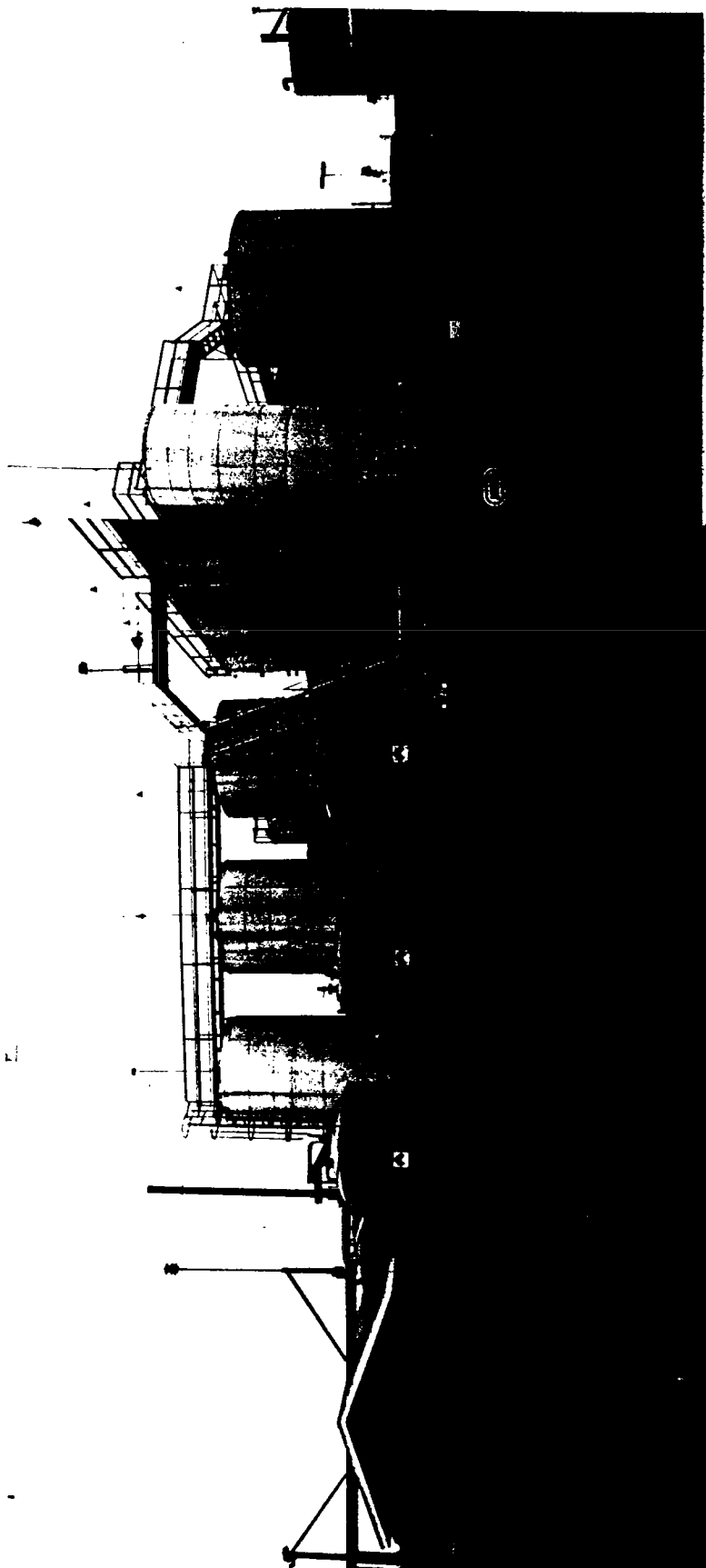
PHOTO #: 122 ROLL #: 91-321

COMMENTS: _____

PHOTOGRAPH BY:

CHARLES GRUNTMAN

O #: _____ ROLL #: 91-321



ILLINOIS ENVIRONMENTAL
SECTION AGENCY PHOTOGRAPH

DATE: March 22, 1991

TIME: 8:30 am to 5:00 pm

SITE NAME: HERITAGE ENVIR.

SERVICES

SITE #: 0311620007

COUNTY: Cook

* * * * *

COMMENTS: FACING W.

tank farm &

solvent storage

area

PHOTOGRAPH BY:

CHARLES J. GRUNTMAN

PHOTO #: 3 ROLL #: 91-321



COMMENTS: FACING SE.

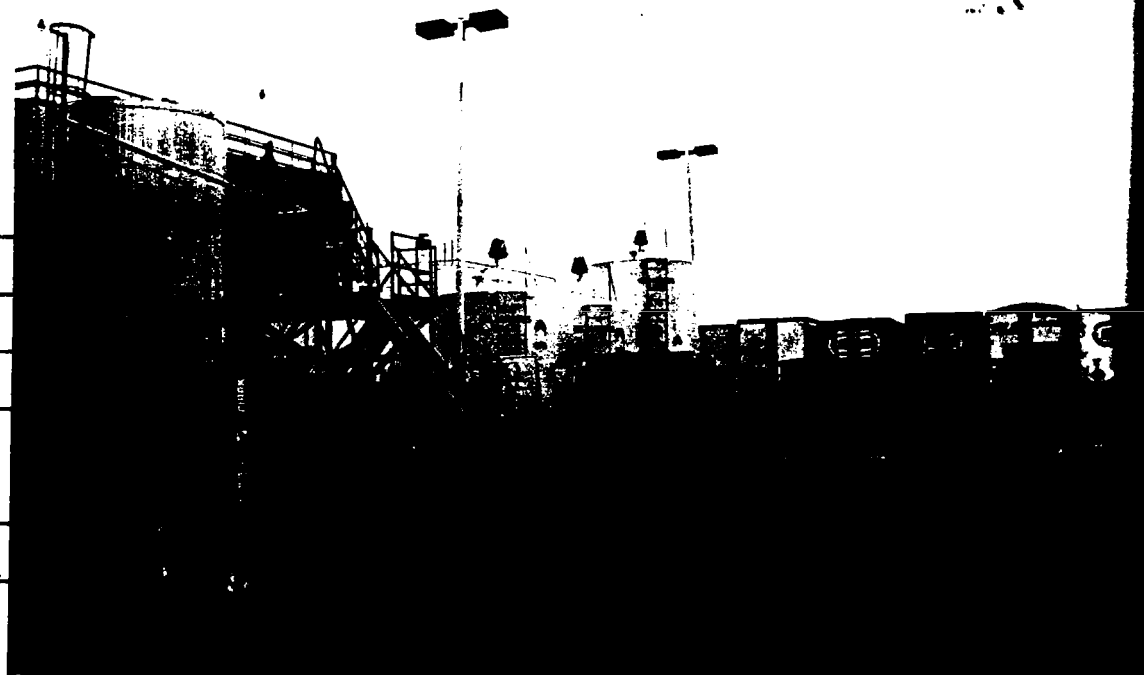
Drum storage

area

PHOTOGRAPH BY:

CHARLES GRUNTMAN

PHOTO #: 4 ROLL #: 91-321



NOIS ENVIRONMENTAL
ACTION AGENCY PHOTOGRAPH

DATE: March 22, 1991

TIME: 8:30 am to 5:00 pm

SITE NAME: HERITAGE ENVIR.

SERVICES

SITE #: 0311620007

COUNTY: Cook

* * * * *

COMMENTS: facing - N

H.W trailer
storage

PHOTOGRAPH BY:

CHARLES J. GRUNTMAN

PHOTO #: 5 ROLL #: 91-321



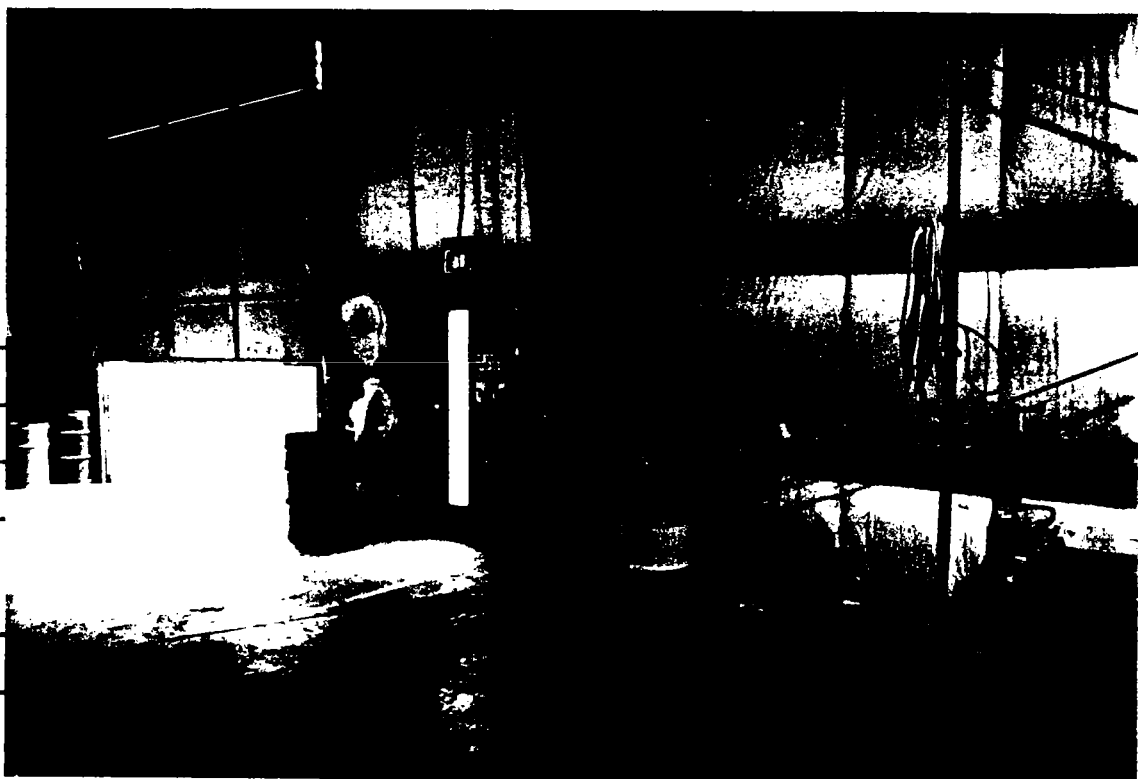
COMMENTS: facing - S

1 parts washer
inside GARAGE

PHOTOGRAPH BY:

CHARLES GRUNTMAN

PHOTO #: 6 ROLL #: 91-321



INOIS ENVIRONMENTAL
PROTECTION AGENCY PHOTOGRAPH

DATE: March 22, 1991

TIME: 8:30 am to 5:00 pm

SITE NAME: HERITAGE ENVIR.

SERVICES

SITE #: 0311620007

COUNTY: Cook

COMMENTS: facing N.E.

Small Dike Around
H.W. trail storage
Area

PHOTOGRAPH BY:

by CHARLES J. GRUNTMAN

PHOTO #: 7 ROLL #: 91-321

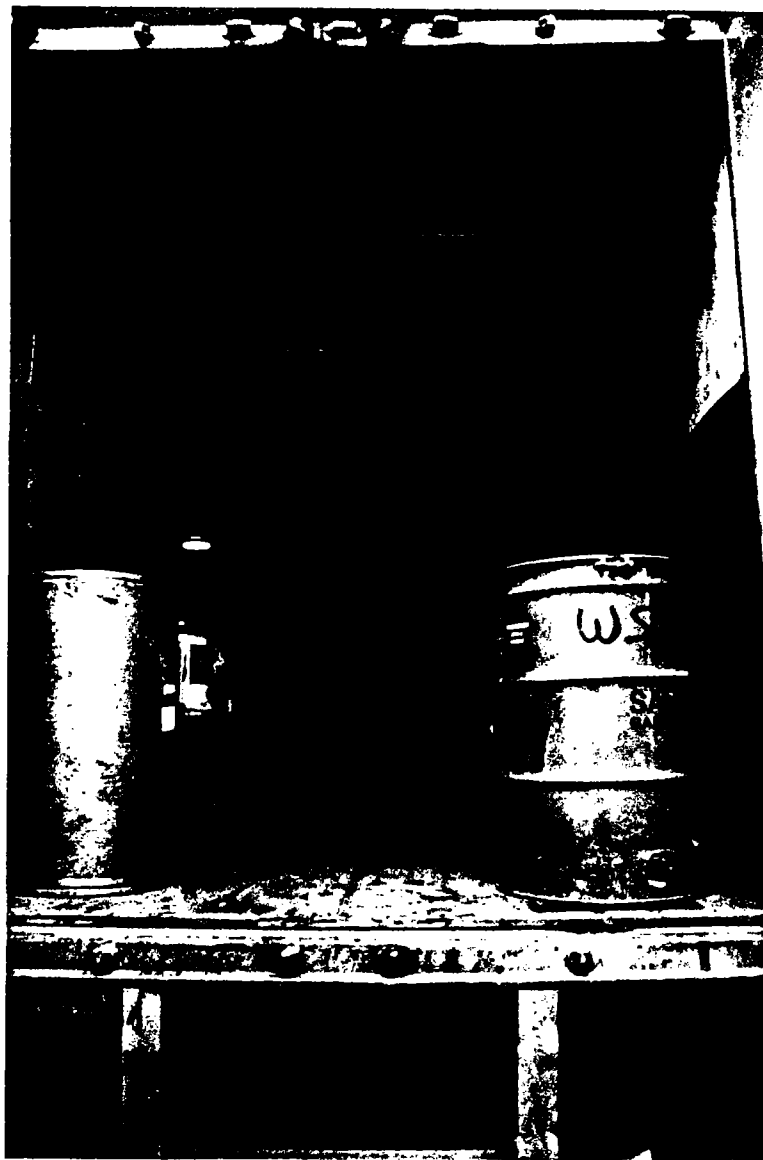
COMMENTS: facing S.E.

In side of
H.W. trailer

PHOTOGRAPH BY:

CHARLES GRUNTMAN

PHOTO #: 8 ROLL #: 91-321



MOIS ENVIRONMENTAL
ACTION AGENCY PHOTOGRAPHS

DATE: March 22, 1991

TIME: 8:30 am to 5:00 pm

SITE NAME: HERITAGE ENVIR.

SERVICES

SITE #: 0311620007

COUNTY: Cook

COMMENTS: FACING N

VAC. tank

PHOTOGRAPH BY:

CHARLES J. GRUNTMAN

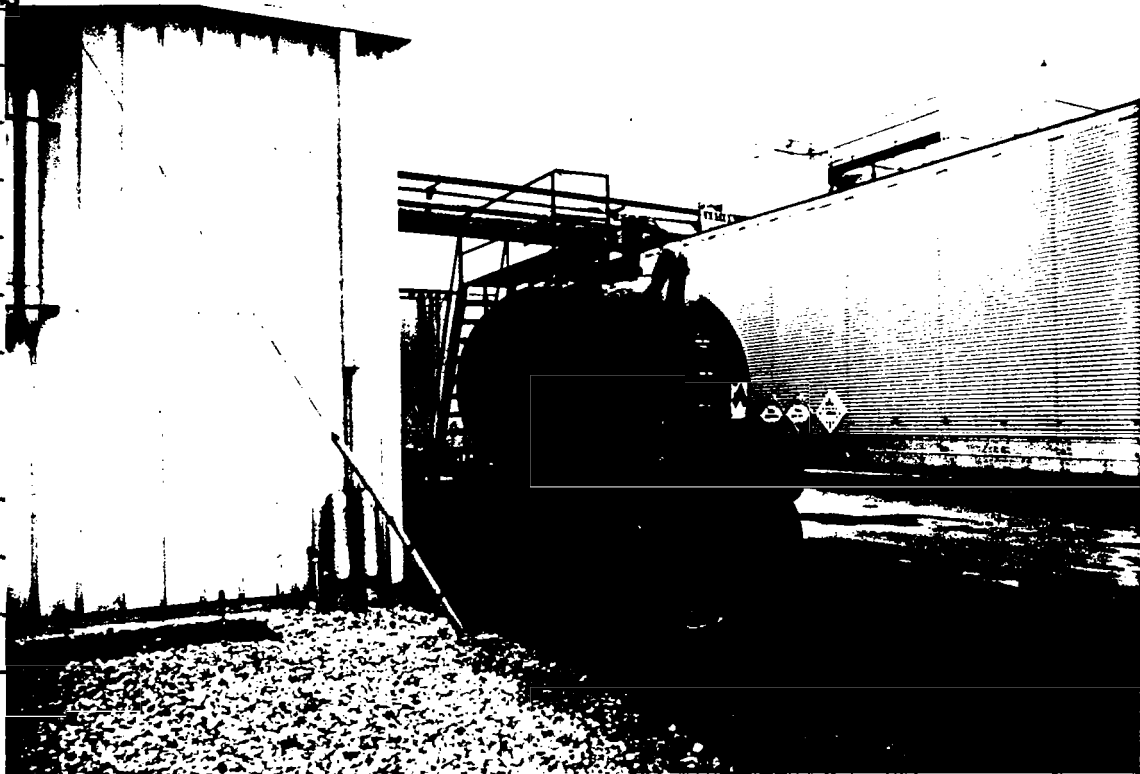
PHOTO #: 9 ROLL #: 91-321

COMMENTS:

PHOTOGRAPH BY:

CHARLES GRUNTMAN

PHOTO #: ROLL #: 91-321



Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			RECEIVED 19 SEP 1991 IEPA/DLPC
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No	
			Sub Sec		Yes	No			
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	<input checked="" type="checkbox"/>				
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.					
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.					
				d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

GEN-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				No bulk rail or water shipments

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?	<input checked="" type="checkbox"/>			
OTH	1	X			Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?	<input checked="" type="checkbox"/>			
OTH	1	X			Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
					b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The manifest document number associated with the container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			<input checked="" type="checkbox"/>	Transporter Supplies. N.A. No accumulation
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:	✓			
					a - A copy of each signed manifest? Yes <u>✓</u> No <u> </u> b - A copy of each annual report? Yes <u>✓</u> No <u> </u> b - A copy of each exception report? Yes <u> </u> No <u> </u> N/A <u>✓</u> c - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <u>✓</u> No <u> </u> N/A <u> </u> d Does a generator who is involved in any unresolved en- forcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <u> </u> No <u> </u> N/A <u>✓</u> d If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <u> </u> No <u> </u> N/A <u>✓</u>				

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	<input checked="" type="checkbox"/>			
MAN	1				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes _____ No _____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			<input checked="" type="checkbox"/>	None required

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>				None required
				<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>			✓	

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No _____ <u>NOTE:</u> If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____ <u>NOTE:</u> If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				No Exports
						✓		

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			<input checked="" type="checkbox"/>	No imports
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
			b2	Has the importer or his agent signed the manifest in place of the generator; and				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2	X		PART 722 GENERATOR STANDARDS Subpart G: Farmers				<i>No farming activity.</i>
				Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).			✓	

GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes _____ No <input checked="" type="checkbox"/> Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes _____ No <input checked="" type="checkbox"/> NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
OTH	1			Section 723.111: USEPA Identification Number a Has the transporter obtained a USEPA identification number?	<input checked="" type="checkbox"/>			
OTH	1	X		Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: - For a period of 10 days or less? Yes _____ No <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			

TR-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><u>NOTE:</u> A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1/2			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping				
				Section 723.120: The Manifest System	<input checked="" type="checkbox"/>			
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> - Signed and dated the accompanying manifests? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Returned a signed copy to the generator before leaving the generator's property? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			d	Has the transporter who delivers hazardous waste to another transporter or to the designated facility:				

TR-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>f Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>g Has the transporter who transports hazardous waste out of the United States: <u>N.A.</u></p> <p>1) Indicated on the manifest the date the hazardous waste left the United States? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes <input type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes ____ No ____				
				4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes ____ No ____				
				Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes <input checked="" type="checkbox"/> No ____	<input checked="" type="checkbox"/>			
				NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes ____ No <input checked="" type="checkbox"/>				
				AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p>AND</p> <p>4) The date the waste is accepted? Yes ____ No ____</p> <p>AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes ____ No ____</p> <p>AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes <input checked="" type="checkbox"/> No ____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes <input checked="" type="checkbox"/> No ____</p> <p>OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>OR</p>				

TR-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			3) The next designated transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				OR				
				4) The place outside the United States designated by the generator? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				NOTE: A "No" answer can still be in compliance.				
			b	In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 723.122: Recordkeeping				
			a	Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			e	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				OR				
			e	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

TR-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges Section 723.130: Immediate Action			✓	No Discharge
			a	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ____ No ____				
			c	Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes ____ No ____				
OTH	1	X		Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> - Clean-up the discharge? Yes ____ No ____ - Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ____ No ____ 			✓	

TR-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	<input checked="" type="checkbox"/>			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____ Is the facility only operating with a RCRA permit? Yes _____ No _____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			<input checked="" type="checkbox"/>	
OTH	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <input checked="" type="checkbox"/> No _____ N/A _____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.154: Prohibitions During Interim Status</p> <p>During interim status, has the facility refrained from:</p> <p>a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 703.155: Changes During Interim Status</p> <p>NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions				
				Section 725.101: Purpose, Scope and Applicability	✓			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No <u>✓</u>				
				NOTE: If "Yes", explain in narrative.				
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ____ No ____ <u>NA</u> ✓				

TSD-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
OIH	1			Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	<input checked="" type="checkbox"/>			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	No foreign waste accepted.
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No ____	<input checked="" type="checkbox"/>			

TSD-B-1

Area	Class	90 Day F-U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-3

Area	Class	90 Day F-U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1	X			<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes ____ No ____ N/A ____</p> <p>NOTE: Circle the specific waste management methods being employed.</p>				
			c	<p>For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes ____ No <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>				

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b	<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ____ No <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No ____</p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No ____</p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Section 725.115: General Inspection Requirements</p> <p>a Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:</p> <p>1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b1 Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b2 Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b3 Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b4 Does the schedule specify at least the following minimum inspection frequency:</p> <p>- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

TSD-B-6

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes ____ No ____ N/A ____</p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No ____</p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No ____</p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No ____ - The name of the inspector? Yes <input checked="" type="checkbox"/> No ____ 				

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<ul style="list-style-type: none"> - A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
				<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-9

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e		Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
			a		Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a		Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			<input checked="" type="checkbox"/>	

TSD-B-12

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			PAGING telephones pull boxes

TSD-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X	c		- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				fire ext. spill pads, absorbent. 40,000 GAL tank & canal.
			d		- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:	<input checked="" type="checkbox"/>			monthly communications used daily. monthly Daily Daily
					- Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					- Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					- Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					- Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					NOTE: Any "N/A" answer must be explained in the Comments.				

TSD-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Clark County police Lemont Fire Dept</p> <p>IL ESOA</p> <p>Silver Cross.</p>

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Con- tingency Plan a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazard- ous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Have the provisions of the plan been carried out immedi- ately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2			Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.	
			Sub Sec		Yes	No			
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
				Section 725.153: Copies of Contingency Plan					<input checked="" type="checkbox"/>
			a	Has a copy (and all revisions) of the contingency plan:					
			a)	Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			b)	Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2			Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			Paul Zajec

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			<p>Plant man Supervisor</p> <p>1988 fire shredder building</p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the facility initiate shipments of hazardous waste? Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>	<input checked="" type="checkbox"/>			
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes <input checked="" type="checkbox"/> No _____</p>				
			d	<p>If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes _____ No _____ NA <input checked="" type="checkbox"/></p>				


TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
			a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Does the operating record contain the following information:				
			1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			3)	The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			4)	The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-3

Area	Class	90 Day F.U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.441 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-E-4

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr		Sub Sec	Yes		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				NA 

TSD-E-5

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>					
				Section 725.174: Availability, Retention and Disposition of Records	<input checked="" type="checkbox"/>			No closure yet.
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				

TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				Section 725.175: Annual Report	<input checked="" type="checkbox"/>			
					Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1				Section 725.176: Unmanifested Waste Report	<input checked="" type="checkbox"/>			
					Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				1 time
					NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
					Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
					Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p> <p>a 1) Releases, fires, explosions as specified in Section 725.156? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b 2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>c 3) Facility closure as specified in Section 725.215? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements	<input checked="" type="checkbox"/>			Submitted with Pt B. Application
			a	Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 				

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A <input checked="" type="checkbox"/> 				
				Section 725.218: Post-Closure Plan				
				a Was the most current facility post-closure plan available during the inspection? Yes ____ No ____				
FIN	1			Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____				
				Section 725.242: Cost Estimate for Closure				
FIN	1			Has the facility prepared a written estimate of the cost of closing the facility?				
				Section 725.244: Cost Estimate for Post-Closure Care				
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
				<u>NOTE:</u> If no post-closure plan, mark "N/A".				

TSD-G/H-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-I-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	✓			

TSD-I-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. <u>NOTE:</u> Tanks or sump pits that serve as part of a second- ary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <u>NOTE:</u> Failing the filter test means that the waste contains free liquids.	<input checked="" type="checkbox"/>			
				Section 725.291: Assessment of Existing Tank Systems a For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <u>NOTE:</u> Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				

TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1		b		<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>			<input checked="" type="checkbox"/>	NO new tanks
			a		<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes <input type="checkbox"/> No <input type="checkbox"/> 				

TSD-J-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ____ No ____	<input checked="" type="checkbox"/>			Tanks have Secondary containment
				Section 725.293: Containment and Detection of Releases				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ____ No ____ N/A ____				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ____ No ____ N/A ____				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			a4	For an existing tank of <u>unknown age</u> , has secondary containment been provided by <u>January 12, 1995?</u> Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			<u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ____ No ____ N/A ____					
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				


TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i	Until such time as <u>secondary containment</u> is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-J-5

Area	Class	90 Day F-U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements	<input checked="" type="checkbox"/>			MANUAL inspections DURING filling
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
OTH	2			Section 725.295: Inspections	<input checked="" type="checkbox"/>			
			c	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems	<input checked="" type="checkbox"/>			
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

TSD-J-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>				 No closure, yet
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p>				
				<p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

TSD-J-8

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:	<input checked="" type="checkbox"/>			
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> or				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	I	X		PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
				Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel				
OTH	I	X	a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ____ No ____ N/A ____				
				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	✓			
OTH	I	X		Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ✓ No ____ N/A ____	✓			
				Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ____ N/A ____ and				

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Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		b	<p>Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		c	<p>Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	I		d	<p>For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		e	<p>Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
	II		f	<p>Has the marketer kept a copy of each certification, sent or received, for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

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Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used Oil Burned for Energy Recovery Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery	<input checked="" type="checkbox"/>			
			b1	Has the marketer conducted an analysis of the used oil? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: If "No", then Subpart E applies. Does the oil exceed any of the specifications listed in 726.140(e)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				NOTE: If "No", then Subpart E does not apply except for 726.143(b)(1) and (b)(6).				
	I		b2	Does the marketer only market the off-specification used oil to burners that have: notified USEPA of their used oil activities, have USEPA ID #, and have the proper combustion devices pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b3	Has the marketer re-notified USEPA as to used oil manage- ment activities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b4	Does the marketer have an invoice system such that re- ceiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

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Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	II		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
	II		b6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery			<input checked="" type="checkbox"/>	
				NOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.				
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b	Has the proper notification been given to USEPA? Yes <input type="checkbox"/> No <input type="checkbox"/>				
				NOTE: Explain your response in the remarks column.				

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RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Heritage Environmental Services
 U.S. EPA ID No.: ~~XXXXXXXXXX~~ / 0311620007
 Street: Canal Bank Rd. N.E.
 City: Lemont State: IL Zip: 60439
 Telephone: 708/ 739-1151

Inspection Date: ~~XXXXXX~~ Time: 8:30 (am/pm)

Weather Conditions: RAIN

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>C.J. Gruzman</u>	<u>IEPA/EIS</u>	<u>708/531-5900</u>

Facility Representatives:	<u>Bob Garcia</u>	<u>Plant Manager</u>	<u>708/739-1151</u>
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See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
F020-F023 and F026-F028	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List*	<u>✓</u>	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>
First Third [40 CFR 268.10]	<u> </u>	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>
Second Third [40 CFR 268.11]	<u> </u>	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>
Third Third [40 CFR 268.12]	<u> </u>	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>

* See Appendix A

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INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Fuel blending of waste solvents & oils
AND remanifesting other generator's
waste that was stored at H.E.S.

LDR Waste Management:

H.E.S. stores waste for other generators.
They can handle almost any waste for
storage; however, the primary business
is fuel blending.

Summary:

No LDR violations observed

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NOV 1981

Signature:

Charles J. Bruntman

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents: ALL
2. F020-F023 and F026-F028 dioxin-containing wastes: _____
3. California List Wastes (See Appendix A): possible lab packs
4. First Third Wastes [40 CFR 268.10]: possible lab packs
5. Second Third Wastes [40 CFR 268.11]: possible lab packs
6. Third Third Wastes [40 CFR 268.12]**: possible lab packs

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ☒ No ☐

If no, list below:

Assigned Classification

Correct Classification

_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes; F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

but possible

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]
 Yes ☐ No ☒ List but possible
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]
 Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☐ No ☐ NA ☒

If available, list each waste code and check the correct treatability group:

Waste Code Subcategory Wastewater* Nonwastewater

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. (40 CFR 268.2(f)(2) and (3))

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ____ No ____ NA ☒

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ____ No ____ NA ☒

*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

____ Organometallics: 40 Part 268, Appendix IV constituents
____ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ____ No ____ NA ☒

*Use of the alternative treatment standards is required. (55 FR 22619)

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ____ No ____ NA ☒

If yes, check the appropriate treatability group:

____ 50 to 500 ppm PCBs
____ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group:

- ☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☒ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☐

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☐

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
_____	_____	____/____/____
_____	_____	____/____/____
_____	_____	____/____/____

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☒ NA ☐

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☒ No ☐

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☒ No ☐

Comments fuel blending

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☒ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

listed waste received are blended
on site.

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ☐ No ☐ NA ☒

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix 1, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?

Yes ☐ No ☒ NA ☐

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☒ No ☐ (If No, go to 4.)

Blowdown

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☒

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

List the wastes F001 → F005

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments Incineration - fuel blending

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ☐

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix B.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
_____	HES (IL)
_____	CWM (IL)
_____	Rollins (Mo)
_____	TWI (IL)
_____	OHM

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☒ No ☐ NA ☐

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ☐ No ☒

If yes, check the appropriate regulatory status:

☐ Interim status for storage
☐ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ☐ No ☒

(If yes, the Generator checklist must also be completed.)

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ☐ No ☐

Comments _____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ☐ No ☐ NA ☐

(If Yes, the TSD checklist must also be completed.)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
California List Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? 2/91

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☒ Generator provides data
☐ Facility performs analyses in on-site laboratory
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☒ No ☐ NA ☐

If analyses are conducted off site, identify lab: _____

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☐ NA ☐

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☒ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☒ No ☐ NA ☐

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☒ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ☐ No ☐

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ☐ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ☐ No ☐

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ☐ No ☐

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☒ No ☐ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ☐ No ☒ NA ☐ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ☐ No ☐ *fuel blending*

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ☒ No ☐ NA ☐

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ☒ No ___ (If No, go to c.)

List the wastes fuel blenders

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ___

If yes, is this method used for the aggregated wastes?

Yes ☒ No ___

Comments burning

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ☒

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☐ No ☒

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☒ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☐ No ☒ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☐ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☒ No ☐ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	<u>H.E.S. in Ind.</u>
_____	<u>Q.H.M.</u>
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ☒ No ☐

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ☐ No ☐

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ☐ No ☐ NA ☐

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ☐ No ☐

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

TSD

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____
Case-By-Case Extension (40 CFR 268.5) _____
No-Migration Petition (40 CFR 268.6) _____
Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☐ No ☒ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☐

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☐

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☐ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

_____	_____
_____	_____
_____	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☐ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ___ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?**

Yes _____ No _____ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes _____ No _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited* wastes with different treatment standards mixed?**

*See Appendix E for distinction between restricted and prohibited wastes.

Yes _____ No _____ (If No, go to b.)

List the wastes

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes _____ No _____

Comments _____

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]**

Yes _____ No _____ (If No, go to c.)

Check appropriate category:

Dilutes to meet treatment standards

Dilutes to render waste non-hazardous

TSD

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes _____ No _____

Comments

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

RCRA INSPECTION REPORT

USEPA #: [REDACTED] IEPA #: 0311620007

Facility Name: Heritage Environmental Services Phone #: 708/739-1150

Street Address: Canal Bank Road, NE County: Cook

City: Lemont State: IL Zip: 60439

Region: [redacted] Inspection Date: [redacted] From: 8:30am To: 1:00pm

Weiner:

TYPE OF FACILITY

Notified As: G, T, TSD, WAF, OSF, S0F Regulated As: G, T, T, S, WAF, OSF, S0F

LDF? ☐ HPV? ☒ 90-Day F/U Required?: YES ☒ NO ☐

TYPE OF INSPECTION

CEI: Sampling: Citizen Complaint: Closed: Other:

CME/C&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS N/A

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 8/19/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 1/12/81 Amended: 11/8/88

Part A Withdrawal requested: ____/____/____ Approved by (US)(IL) EPA: ____/____/____

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 11 / 10 / 88 Final Permit Issued: / / N/A

ENFORCEMENT

Has the firm been referred to -- USEPA: (Y) or N 4 / 1 / 85

Illinois Attorney General: Y or (N) ___/___/___ County State's Attorney: Y or (N) ___/___/___

ORDERS ISSUED

CACO: 4 / 1 / 85 CAFO: 9 / 26 / 85 Consent Decree: / /

Federal Court Order: ____/____/____ State Court Order: ____/____/____ IPCB Order: ____/____/____

TSD FACILITY ACTIVITY SUMMARY[illegible]

SUMMARY OF APPARENT VIOLATIONS

OWNER

OPERATOR

Name Metropolitan Water Reclamation District	Name Heritage Environmental Services, Inc.
Address 100 E. Erie St.	Address Canal Bank Road, NE
City Chicago	City Lemont
State IL Zip 60611	State IL Zip 60439
Phone # 312/675-8099	Phone # 708/739-1150

PERSON(S) INTERVIEWED

TITLE**PHONE #**

Bob Garcia	Plant Manager	708/739-1150

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Jahn, Mike	IEPA/EP5	708/345-9780

PREPARED BY

AGENCY/TITLE**PHONE #**

John Maher	IEPA/EP5	768/345-9780
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[illegible][illegible][illegible]

NARRATIVE

INTRODUCTION

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. At this location (Canal Bank Road, Lemont), there are four divisions (or units): the treatment plant, which is the subject of this inspection; HES transportation; Remediation Engineering, which will be leaving this location in November, 1990; and Petroleum Management, which is a new division for this location. The treatment plant stores and treats hazardous and non-hazardous waste from off-site. HES transportation services the transportation needs for HES and HES customers. Remediation Engineering responds to emergencies and performs site clean-ups. Petroleum Management utilizes a multi-stop permit to pick up waste oil from customers such as Jiffy Lube.

TREATMENT PLANT ACTIVITIES

HES reclaims/reuses waste oil and hazardous waste mixtures. Hazardous waste fuel (subject to Part 726) is produced from waste oil and ignitable hazardous waste by separating phases within wastes and mixing the various waste streams. They also produce on-spec waste oil fuel by using heat and chemical separation of waste oil and contaminants, such as water.

One of HES's other activities includes providing temporary container storage of hazardous waste for the Drug Enforcement Administration (DEA). (The containers are placed in the semitrailers until the wastes are sent for incineration off site.) HES also provides temporary storage for lab packs until they are sent off site (usually for incineration). (HES is planning on getting permitted to remove the contents of the lab packs they receive so they can incorporate some the materials into the hazardous waste fuel program.)

HAZARDOUS WASTES GENERATED

Hazardous Waste Fuel F001-F005

- A mixture of the ignitable hazardous waste and non-hazardous waste oil received from off site.
- Sent to cement kilns (Systech in Indiana and Continental Cement in Missouri).

Used Oil & Oil/water Mixtures D008 12 OCT 1990

- Waste oil that exhibits the characteristic of EP Toxicity for lead and is brought on site, but which the site is not able to treat. It typically does not exhibit this characteristic.
- Sent to HES in Indianapolis for treatment.

Waste Petroleum Naphtha D008

- Generated from a parts degreaser is owned and serviced by Safety-Kleen.
- Reclaimed by Safety-Kleen in Mokena, Illinois.

Waste Flammable Solids D001, F001-F005

- Spill pads and contaminated soil from Remediation Engineering's off-site activities.
- Incinerated at OHM in Georgia.

Flammable Solids D001, F001-F005

- Strainer cleanings from secondary fuel blending process.
- Incinerated at OHM in Georgia.

Lab Packs

- Received from off site clean-up projects, such as school chemistry lab clean-ups.
- Never opened by HES. Sent for incineration at HES in Indianapolis or at TWI in Illinois.

Listed Hazardous Water

- Bulking of off-site drums of hazardous waste water.
- Sent for incineration at Rollins in Baton Rouge, LA.

Waste Received but Treated Elsewhere

- Waste received for temporary storage (e.g., DEA waste) and sent off site for disposal.
- Sent to HES in Indianapolis for incineration.

NON-HAZARDOUS WASTES GENERATED

Solids

- Non-hazardous tank bottoms, ERU soils from clean-ups, cut up plastic drums, etc.
- Sent to CID Landfill in Chicago.

Waste Oil

- Non-hazardous loads of waste oil that are too difficult to separate at this location. (As a result of this site's recent use of chemical separation of waste oil, this waste stream is rarely generated.)
- Sent to HES in Indianapolis for further treatment.

Treatment Water

- Reaction water from the phase separation of waste oil and water. (As a result of this site's recent use of chemical separation of waste oil, the volume of this waste stream generated has increased many fold.)
- Sent to HES in Indianapolis for treatment.

Crushed Drums

- RCRA empty metal containers that are ~~crushed~~ in a hydraulic compacter.
- Sent to US Steel (USX) for use in their furnaces to recover the steel. (Since it is handled as scrap metal, it is no longer handled as special waste.)

12083 1990
HSA/5152

REGULATED HAZARDOUS WASTE UNITS

Container Storage (S01)

Containers are stored on a diked, concrete pad and in several locked semi-trailers. Incompatibles are stored on opposite ends of the concrete pad.

Tank Storage (S02)

Storage tanks are situated on a concrete pad with concrete secondary containment. (NOTE: the secondary containment is not in compliance with 725.293, but compliance will not be required until 1995.) The tank farm includes initial receiving tanks (VRT 1 through VRT 4), cone bottom gravity separation tanks (CB-1 through CB-4) and product storage tanks (SF-1 through SF-6 and OS-2).

Treatment in Tanks (T01)

Heat treatment occurs in HT-1 through HT4. Waste is heated, which facilitates oil/water separation. They also use chemical separation.

Treatment in Containers (T04)

Treatment in containers is not occurring at this time.

NOTE: A CAFO was issued on 9/26/85. Per previous inspector's reference of another inspector's observations, HES is in compliance with the CAFO.

APPARENT VIOLATIONS

At the time of the inspection, the following apparent violation was observed:

725.294 - Level sensing devices were not installed on tanks storing hazardous waste.

726.15(a)(2) - CONTAINERS OF HAZARDOUS WASTE WERE NOT MARKED WITH THE
DATE OF ACCUMULATION BEGAN

RECEIVED
12 OCT 1990
HERA/ELC

HAZARDOUS WASTE DISPOSITION FORM

Facility Name: Heritage Environmental Services
 USEPA #: IL D 0 2 5 3 4 9 2 6 4
 IEPA #: 0 3 1 1 6 2 0 0 7

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #					On Annual Report for: (Circle if present; cross out if not present)					Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 89	* 19 88	* 19 87									
Hazardous Waste Fuel	See Narrative	9-26-90	Few 1 Fuos	Yes	Yes	G	G	G	G	G	G	71,000 gal	50,000 per month	9-26-90	See Narrative	
Used oil & oil/water mixtures		7-31-90	D008			G	F	G	F	G	F	None	Irregular	7-31-90		
Waste Petroleum Naptha		N/A	D001			G	F	G	F	G	F	None	15 gal per month	8-27-90		
Waste Flammable Solids		No analysis (Finger print)	Dual Fuel Fuos			G	F	G	F	G	F	100 drums	50,000 gal per year	↑ 9-4-90		
Flammable Solids		No analysis (Finger print)	↓			G	F	G	F	G	F	15 drums	(combined)	↓		
Lab Packs		No analysis - Inventory Sheets	Various			G	F	G	F	G	F	16,000 gal	20,000 per year	8-27-90		
Waste Hazardous Water		No analysis (Finger print)	Various			G	F	G	F	G	F	10,000 gal	20,000 gal per year	9-4-90		
Waste received but treated Elsewhere	✓	8-8-90	Various	✓	✓	G	F	G	F	G	F	69 drums	25,000 gal per year	9-7-90	✓	
						G	F	G	F	G	F					
						G	F	G	F	G	F					

* All "NO" responses must be explained in narrative.

NON-HAZARDOUS WASTE DISPOSITION FORM

Facility Name: Heritage Environmental Services
 USEPA #: IL D C 8 5 3 4 9 2 6 4
 IEPA #: 0 3 1 1 6 2 0 0 0 7

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition	
			* On 8700-12	* On 3510-3	* On 3510-3	* On 3510-3	* On 3510-3	* On 3510-3					
Solids	See Narrative	No analysis	N/A	N/A	N/A	G	F	G	F	20 c.y.	20 c.y. per quarter	7-31-90	See Narrative
Waste oil		8-30-90				G	F	G	F	None	rare	8-30-90	
Treatment Water		9-26-90				G	F	G	F	46,000 gal	Recently increased. Rate unknown	9-26-90	
Crushed Drums		No analysis				G	F	G	F	No handled as scrap metal	Not manifested		Scrap metal. (reclaimed)
						G	F	G	F				USX in Gary, IN
						G	F	G	F				
						G	F	G	F				
						G	F	G	F				
						G	F	G	F				
						G	F	G	F				
						G	F	G	F				
						G	F	G	F				

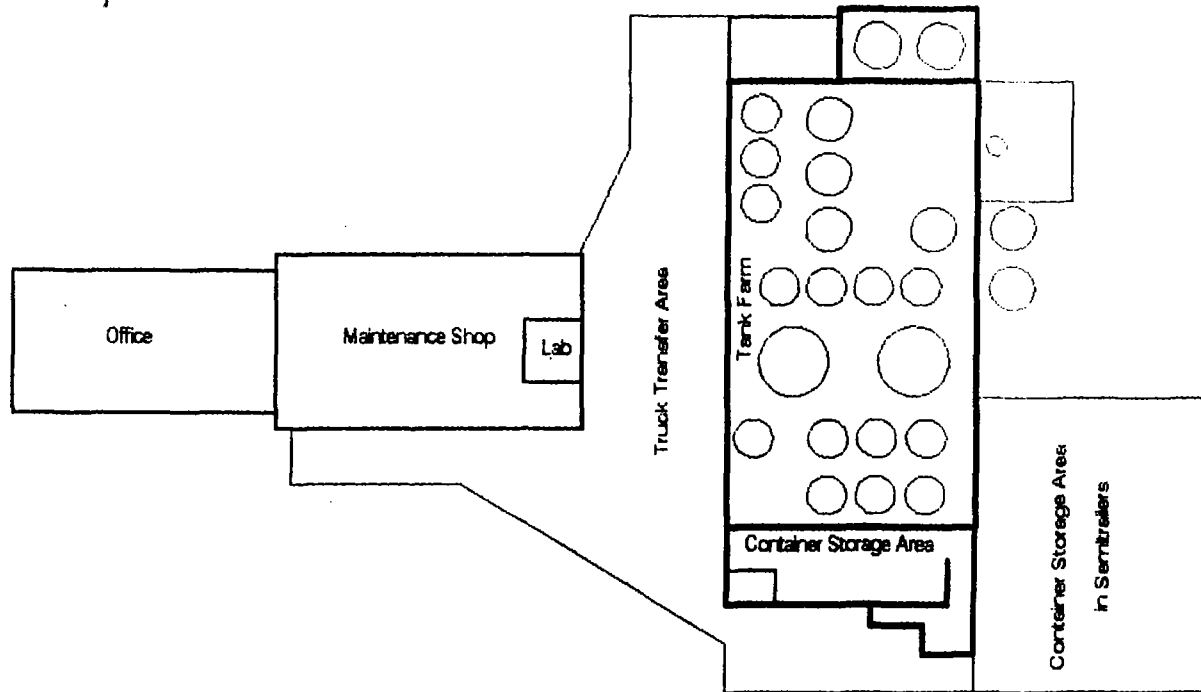
* All "NO" responses must be explained in narrative.

Heritage Environmental Services Inc.

0311620007

September 28, 1990

Canal Bank Road

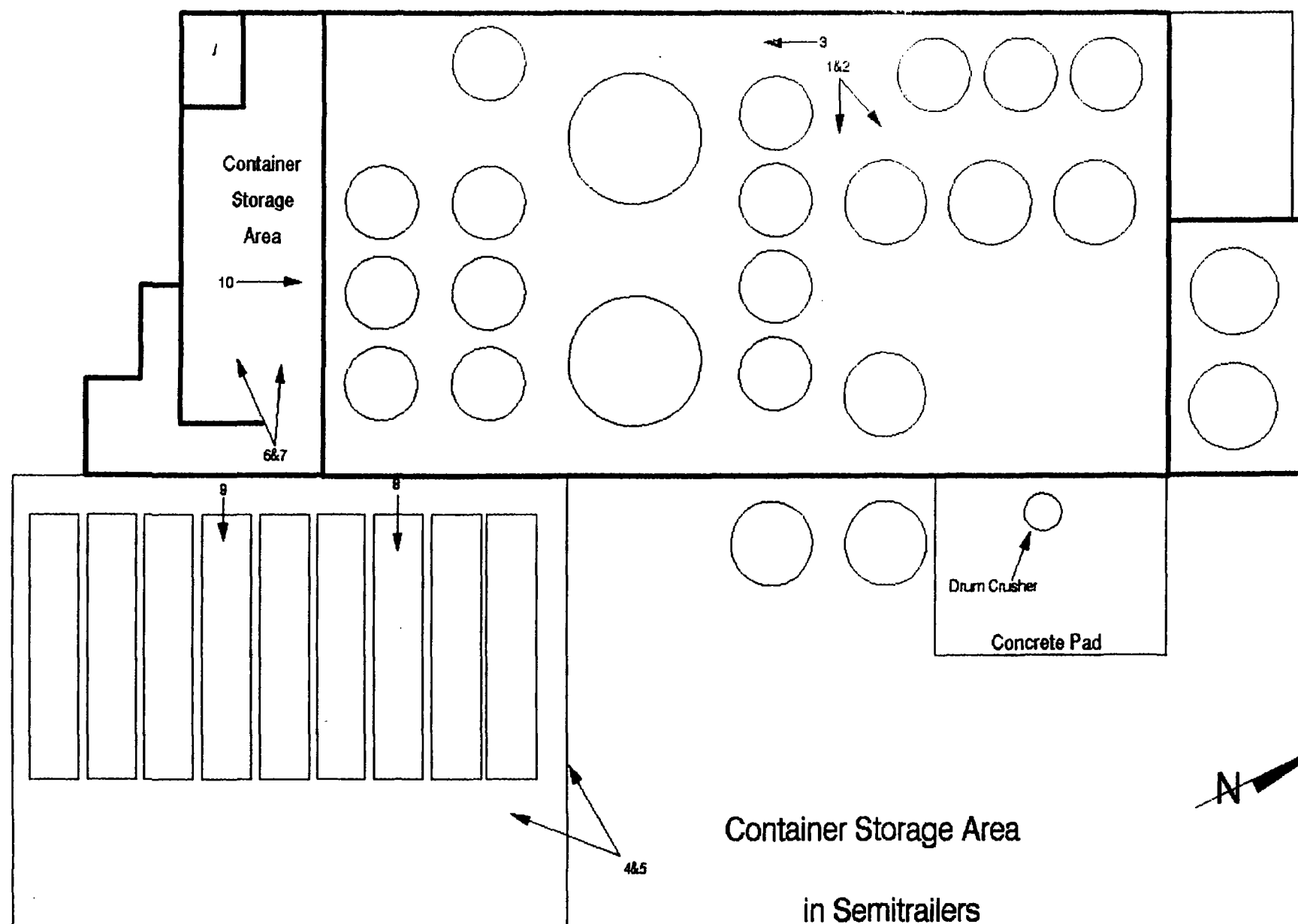


0311620007
09/28/90
J. MAHER



Ditch

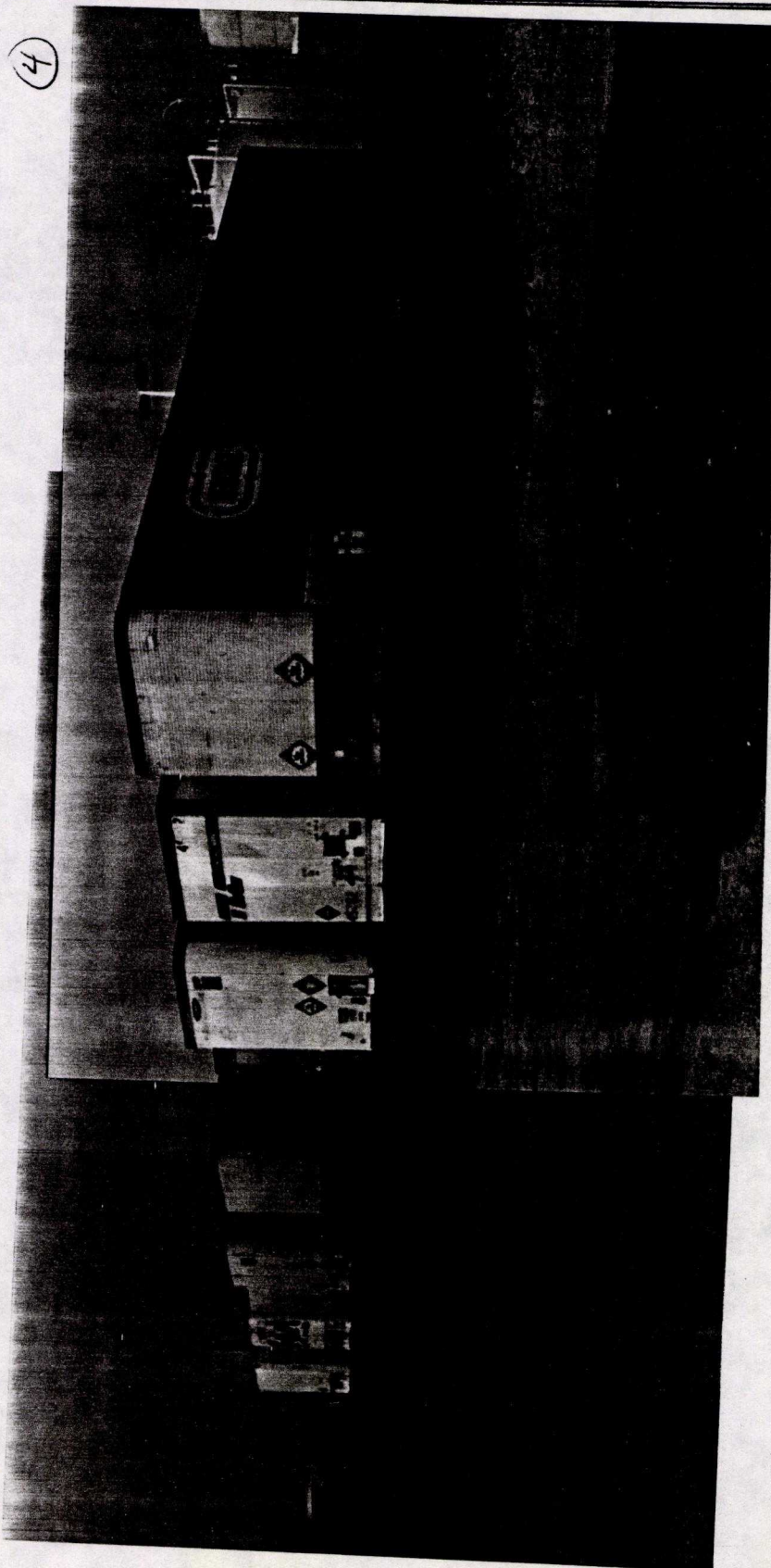
J. Maher



Illinois Environmental Protection Agency Photographs

Site Name: Heritage Environmental Services Inc. Site #: 0311620007

Date: 9-28-90 Time: 8:30am - 1:00pm Photograph By: John Maher

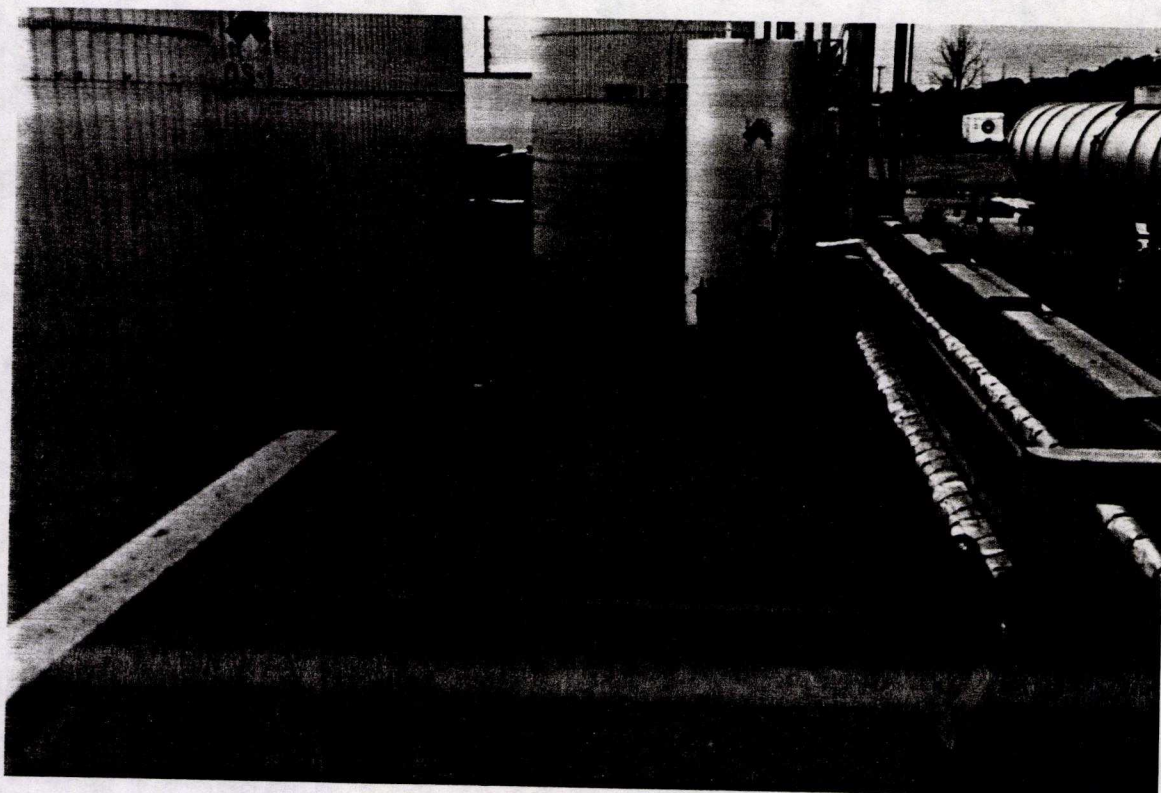


Comments: Container Storage Area within Semitrailers

Roll #: 91-72 Photo #: 4 & 5

Illinois Environmental Protection Agency Photographs

Site Name: Heritage Environmental Services Inc. Site #: 0311620007
Date: 9-28-90 Time: 8:30am - 1:00pm Photograph By: John Maher

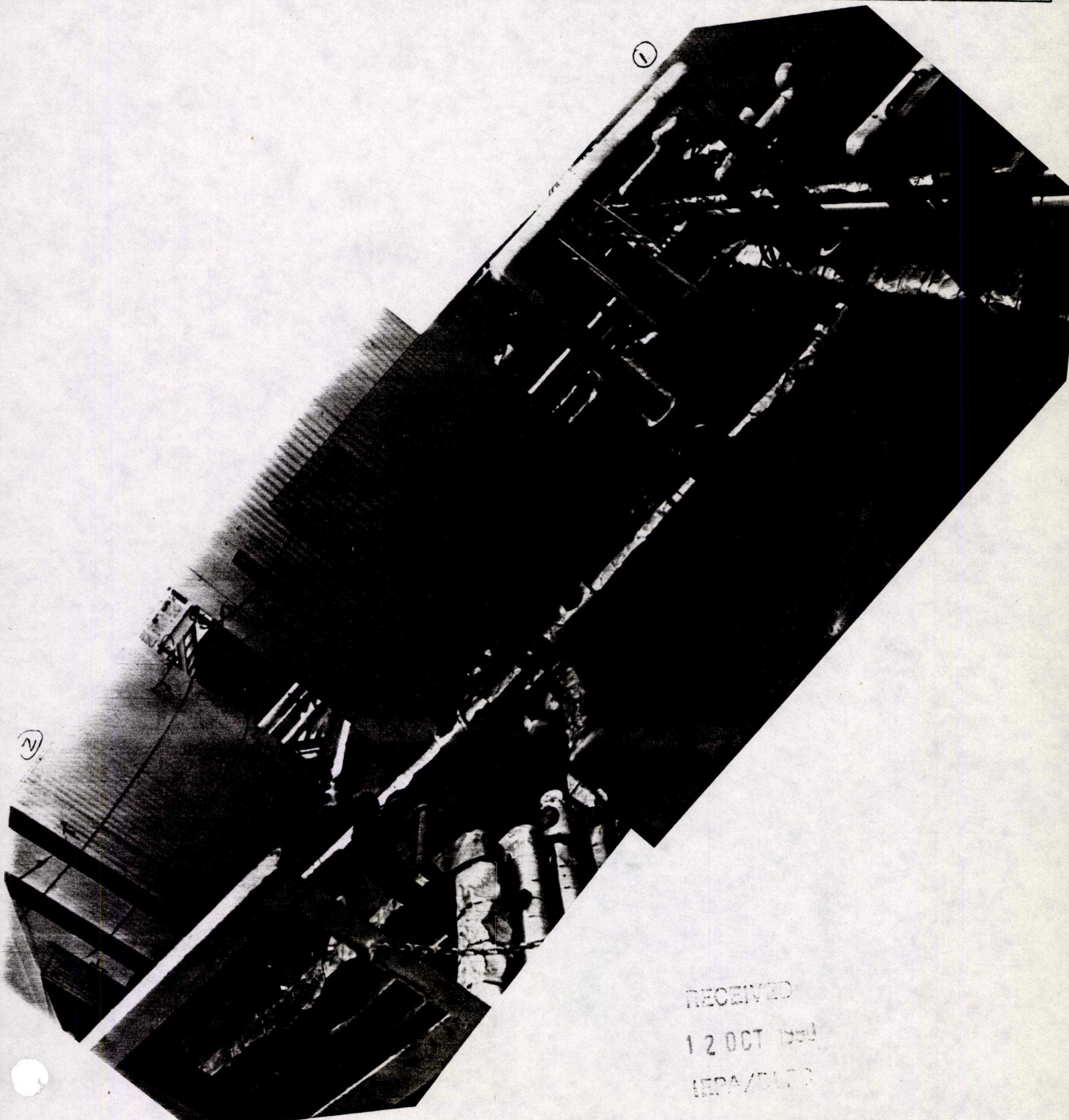


Comments: Tank Farm

Roll #: 91-72 Photo #: 3

Illinois Environmental Protection Agency Photographs

Site Name: Heritage Environmental Services Inc. Site #: 0311620007
Date: 9-28-90 Time: 8:30am - 1:00pm Photograph By: John Maher



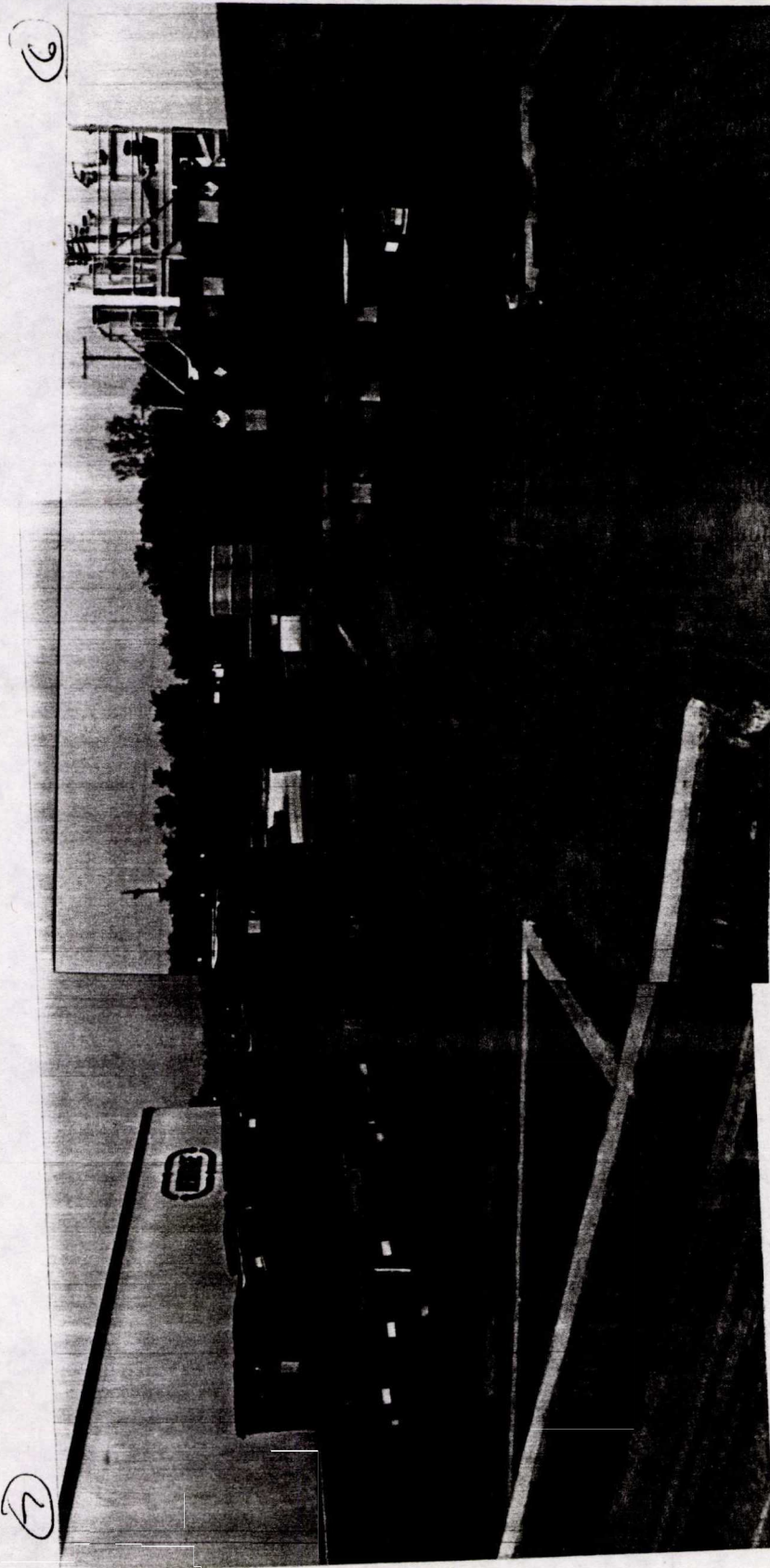
RECEIVED
12 OCT 1990
IEPA/ELCO

Comments: Tank Farm; showing there is no coating on the secondary
containment

Roll #: 91-72 Photo #: 1 of 2

Illinois Environmental Protection Agency Photographs

Site Name: Heritage Environmental Services Inc. Site #: 0311620007
Date: 9-28-90 Time: 8:30am - 1:00pm Photograph By: John Maher



Comments: Container Storage Area

Roll #: 91-72 Photo #: 647

Illinois Environmental Protection Agency Photographs

Site Name: Heritage Environmental Services Inc. Site #: 0311620007
Date: 9-28-90 Time: 8:30am - 1:00pm Photograph By: John Maher



Comments: Containers within semitrailer

Roll #: 91-71 Photo #: 8

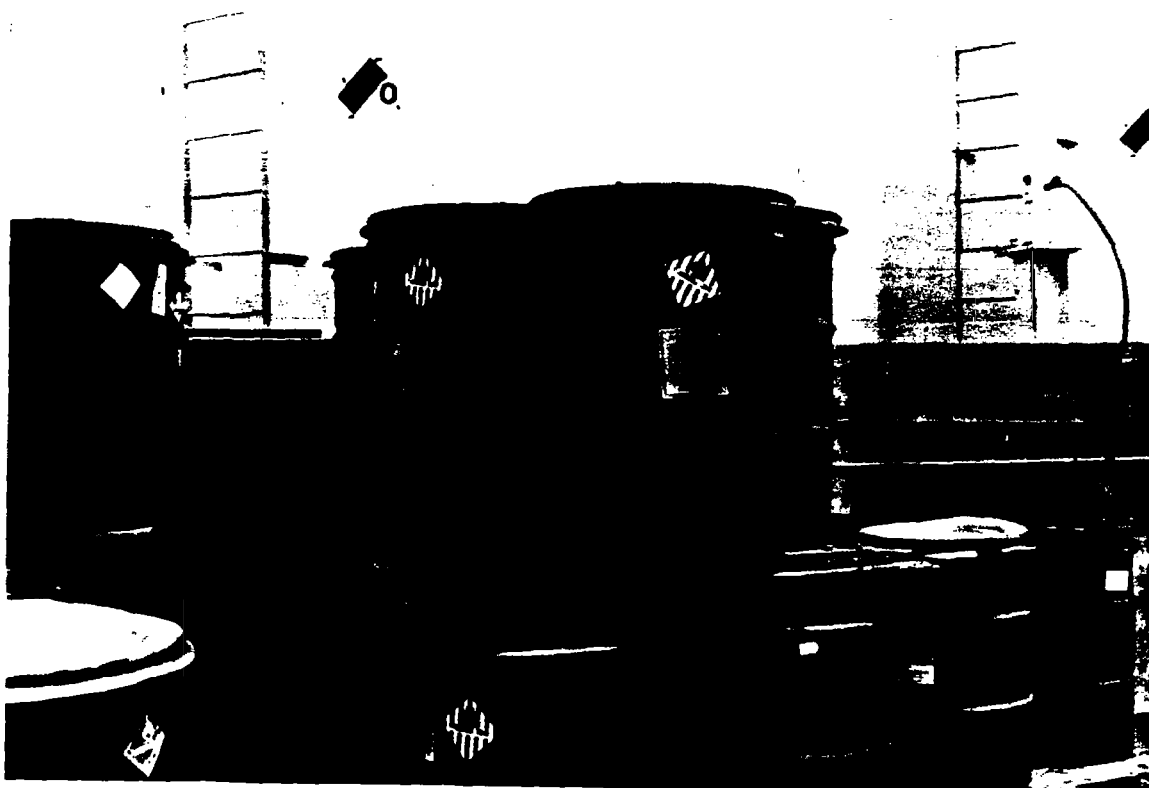


Comments: Containers within semitrailer

Roll #: 91-71 Photo #: 9

Illinois Environmental Protection Agency Photographs

Site Name: Heritage Environmental Services Inc. Site #: 0311620007
Date: 9-28-90 Time: 8:30am - 1:00pm Photograph By: John Maher



Comments: Container storage area; no storage date on LDR waste
Roll #: 91-72 Photo #: 10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	X			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <u>X</u> No <u> </u>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <u>X</u> No <u> </u>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <u> </u> No <u> </u> <u>N/A</u>				

GEN-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				
OTH	1	X			Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			X	Not ready for transportation.
OTH	1	X			Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			X	
OTH	1	X			Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes _____ No _____			X	
					b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes _____ No _____ - The manifest document number associated with the container? Yes _____ No _____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes _____ No _____				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.	X			
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				→ See Page GEN-C-2(a)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time	<input checked="" type="checkbox"/>			No waste "accumulated" in tanks.
				<p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-2(a)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes _____ No _____ N/A _____ - Complying with the requirements of: <ul style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes _____ No _____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes _____ No _____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes _____ No _____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes _____ No _____ 				<p>N/A - No satellite accumulation</p> 

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes _____ No _____</p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes _____ No _____</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes _____ No _____</p>				↓

GEN-C-27

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping	X			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes <u>X</u> No <u> </u>				
			b	- A copy of each annual report? Yes <u>X</u> No <u> </u>				
			b	- A copy of each exception report? Yes <u> </u> No <u> </u> N/A <u>X</u>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <u>X</u> No <u> </u> N/A <u> </u>				
d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <u> </u> No <u> </u> N/A <u>X</u>							
d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <u> </u> No <u> </u> N/A <u>X</u>							

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	X			
MAN	1			Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes _____ No _____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			X	

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>			X	
				<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				

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Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No _____ <u>NOTE:</u> If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____ <u>NOTE:</u> If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.			X	

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			X	
				b1 Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
				b2 Has the importer or his agent signed the manifest in place of the generator; and				
				b2 Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
				c Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2	X			PART 722 GENERATOR STANDARDS Subpart G: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).			X	

GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	X			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____ Is the facility only operating with a RCRA permit? Yes _____ No _____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			X	Not a new facility.
OTH	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <input checked="" type="checkbox"/> No _____ N/A _____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	X			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1			Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions				
				Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No <u>X</u> NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ____ No ____ <u>N/A</u>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
OTH	1			Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	X			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A <u>X</u>	X			
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes <u>X</u> No ____ N/A ____				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <u>X</u> No ____	X			

UP R-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				Finger print analysis. Every shipment is finger print analyzed.
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

ISD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTII	1	X			<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p>				
			c			<p>For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>		

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Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

ISD-B-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements	<input checked="" type="checkbox"/>			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
b4	Does the schedule specify at least the following minimum inspection frequency:							
				- Daily inspections of areas subject to spills? Yes <input type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

ESD-B-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A <u>X</u></p> <p>C) Communications or alarm systems? Yes <u>X</u> No ____ N/A ____</p> <p>D) Response to fire or explosion? Yes <u>X</u> No ____ N/A ____</p> <p>E) Response to ground water contamination incidents? Yes ____ No ____ N/A <u>X</u></p> <p>Does the program cover the implementation of the contingency plan? Yes <u>X</u> No ____</p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <u>X</u> No ____ N/A ____</p> <p>c Has the facility conducted an annual review of the initial training? Yes <u>X</u> No ____ N/A ____</p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <u>X</u> No ____</p>				

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e		Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	<input checked="" type="checkbox"/>			
		a		Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
		a		Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

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Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			<input checked="" type="checkbox"/>	

1SD-B-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <p>a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

ISD-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
			d	<ul style="list-style-type: none"> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p> <p>Section 725.133: Testing and Maintenance of Equipment</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems	X			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <u>X</u> No <u> </u> N/A <u> </u>				
OTH	1	X	b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <u> </u> No <u> </u> N/A <u>X</u>				
				Section 725.135: Required Aisle Space	X			
OTH	2			Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
			a	Section 725.137: Arrangements with Local Authorities Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	X			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Only one will initially respond.</p> <p>They are an an ER contractor.</p>

ISD-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan	X			
			a Is a plan available? Yes <u>X</u> No <u> </u> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <u>X</u> No <u> </u> b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <u>X</u> No <u> </u> N/A <u> </u>					
OTH	2			Section 725.152: Content of Contingency Plan	X			
				a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <u>X</u> No <u> </u> 2) Explosions? Yes <u>X</u> No <u> </u>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

ISD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.153: Copies of Contingency Plan	<input checked="" type="checkbox"/>			
			a	Has a copy (and all revisions) of the contingency plan:				
			a)	Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b)	Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: <ul style="list-style-type: none"> a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	2			Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>9-1-88- Shredder exploded. See 3-89 inspection report.</p>

ISD-D-5

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting				
				Section 725.171: Use of Manifest System	X			
				Does the facility accept waste from off-site? Yes X No ____				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
				a1 1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes X No ____				
		a2 2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes X No ____ N/A ____						
		a3 3) Immediately give one copy of the completed manifest to the transporter? Yes X No ____						
		a4 4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes X No ____						
		a5 5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes X No ____						

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A <u>X</u></p> <p>Does the facility initiate shipments of hazardous waste? Yes <u>X</u> No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>			<u>X</u>	<p>Unacceptable shipments are rejected.</p> 
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes _____ No _____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes _____ No _____</p>				

TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.	
			Sub	Sec		Yes	No			
OTH	2				Section 725.173: Operating Record	<input checked="" type="checkbox"/>				
					a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					b	Does the operating record contain the following information:				
					1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					3)	The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4)	The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <p>- 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.441 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>- 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

ISD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <u>X</u> No <u> </u></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <u> </u> No <u> </u> N/A <u>X</u> - 725.194 (G.W. Monitoring)? Yes <u> </u> No <u> </u> N/A <u>X</u> - 725.376 (Land Treatment)? Yes <u> </u> No <u> </u> N/A <u>X</u> - 725.378 (Land Treatment)? Yes <u> </u> No <u> </u> N/A <u>X</u> - 735.380(d)(1) (Land Treatment)? Yes <u> </u> No <u> </u> N/A <u>X</u> - 725.447 (Incinerators)? Yes <u> </u> No <u> </u> N/A <u>X</u> - 725.477 (Thermal Treatment)? Yes <u> </u> No <u> </u> N/A <u>X</u> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				

ISD-E-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.174: Availability, Retention and Disposition of Records	<input checked="" type="checkbox"/>			
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <u>N/A</u> <input checked="" type="checkbox"/>				
				- The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/>				
				- The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	2				Section 725.175: Annual Report	<input checked="" type="checkbox"/>			
					Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1				Section 725.176: Unmanifested Waste Report			<input checked="" type="checkbox"/>	
					Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
					Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
					Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
					Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ___ No ___ N/A <u>X</u></p>				
				<p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	<u>X</u>			
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <u>X</u> No ___ N/A ___</p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ___ No ___ N/A <u>X</u></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes ___ No ___ N/A <u>X</u></p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				
				Section 725.212: Closure Plan	X			
			a	<p>Was the most current facility closure plan available during the inspection? Yes <u>X</u> No <u> </u></p> <p>Was the closure plan submitted to the Agency within the time frames specified below:</p> <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <u> </u> No <u> </u> N/A <u>X</u> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <u> </u> No <u> </u> N/A <u>X</u> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <u>X</u> No <u> </u> N/A <u> </u> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <u> </u> No <u> </u> N/A <u> </u> 				

ISD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes _____ No _____ N/A <u>X</u> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes _____ No _____ N/A <u>X</u> 				
				Section 725.218: Post-Closure Plan a Was the most current facility post-closure plan available during the inspection? Yes _____ No _____ Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes _____ No _____ N/A _____			<u>X</u>	
FIN	1			Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	<u>X</u>			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? NOTE: If no post-closure plan, mark "N/A".			<u>X</u>	

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	X			
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	X			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <u>X</u> No <u> </u> b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>X</u> No <u> </u>	X			
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <u>X</u> No <u> </u>	X			


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	X			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	X			


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	2			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
				Section 725.291: Assessment of Existing Tank Systems a For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.	<input checked="" type="checkbox"/>			

150-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
				<p>Section 725.292: Design and Installation of New Tank Systems or Components</p> <p>a For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>			<input checked="" type="checkbox"/>	

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				
				Section 725.293: Containment and Detection of Releases			X	
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A <u>X</u>				Ages of tanks are unknown and facility is not 15 yrs old yet. Secondary containment does not have the existing.
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A <u>X</u>				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes _____ No _____ N/A <u>X</u>				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No _____ N/A <u>X</u>				
			<u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No _____ N/A <u>X</u>					
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A <u>X</u>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes ____ No ____ N/A <u>X</u></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				<p>N/A - see above.</p> 
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <u>X</u> No ____ N/A ____</p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ____ No ____ N/A ____ <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;</p> <p>2) welded flanges, joints and connections that are inspected daily;</p> <p>3) sealless or magnetic coupling pumps that are inspected daily; and</p> <p>4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes ____ No ____ N/A ____</p> <p>i Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ____ No ____ N/A <u>X</u></p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ____ No ____ N/A <u>X</u></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A <u>X</u></p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements		<input checked="" type="checkbox"/>		No level sensing devices.
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ___ No <input checked="" type="checkbox"/>				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ___ No ___ N/A <input checked="" type="checkbox"/>				
OTH	2		c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ___ No ___ N/A <input checked="" type="checkbox"/>				
				Section 725.295: Inspections	<input checked="" type="checkbox"/>			
			c	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No ___				
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems			<input checked="" type="checkbox"/>	
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes ___ No <input checked="" type="checkbox"/>				
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ____ No ____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____</p> <p>NOTE: If the component is above ground and can be visually inspected, then secondary containment is not needed.</p>				N/A

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes _____ No _____ N/A _____</p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>			X	<p>↓</p> <p>No closures</p> <p>↓</p>
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes _____ No _____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes _____ No _____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes _____ No _____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>			<input checked="" type="checkbox"/>	No incompatible in tanks.

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			X	No significantly different wastes stored in tanks. 
			a 1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____ or b 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____ NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.					

EPCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Heritage Environmental Services Inc.

U.S. EPA I.D. No.: [REDACTED] 331163007

Street: Local Bank Bldg. NE

City: Chicago State: IL Zip: 60439

Telephone: 708/739-1150

Owner/Operator: Metropolitan Water Reclamation District

Street: ~~Metropolitan~~ 10 E. Erie St.

City: Chicago State: IL Zip: 60611

Telephone: 708/739-1150

Inspection Date: [REDACTED] Time: 1:30 PM - 1:45 PM

Weather Conditions: _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>John Maher</u>	<u>IEPA/EPS</u>	<u>708/345-9730</u>

Facility Representative:	<u>Bob Garcia</u>	<u>Plant Manager</u>	<u>708/739-1150</u>
--------------------------	-------------------	----------------------	---------------------

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>✓</u>	<u>_____</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>
Dioxin	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List	<u>✓</u>	<u>_____</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>
First Third	<u>✓</u>	<u>_____</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>
Second Third	<u>✓</u>	<u>_____</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>

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IEPA/DLPC

INSPECTION SUMMARY

Processes That Generate LDR Wastes

Temporary storage and generation of hazardous waste fuels.

LDR Waste Management

Wastes are managed in tanks and containers. Some containers are also stored within ~~trailer~~ semi-trailers. Tanks are used for both storage and treatment.

Summary

One apparent violation was observed during the inspection:

722.150(a)(2) - failure to mark containers with the storage date.

WASTE IDENTIFICATION

a. F001 through F005 spent solvents

b. Dioxin-containing Wastes

c. California List Wastes

1. First and Second Third Wastes

* List wastes if room allows or attach Appendix A.

2. Does the facility handle the following wastes (national capacity variances)?

Yes _____ No ☒ Comments _____

Yes	No	Comments

Yes ☐ No ☐ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☐ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes X No NA

If yes, check the appropriate treatability group.

Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)

 All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ✓ No NA

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
All waste		
<u>Codes except dioxin</u>	<u> </u>	<u> X </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☒ NA ☐ Used as fuel (per Part 726)

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☒ No ☐ Comments Waste product is sent as fuel.

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments Wastes are incinerated in a cement kiln.

5. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Waste included listed solvents

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☐ NA ☒

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☐ No ☐ NA ☒

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- pH ≤ 2 Yes ☒ No ☐ NA ☐

List the wastes for which pH testing was used.

All wastes suspected of being corrosive

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

B. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments Site has interim status

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store</u>
<u>All waste codes except RCRA</u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

<u>Waste Code</u>	<u>Facility</u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No N/A (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(iii)	Manifest number	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(iv)	Waste analysis data, if available	Yes <input type="checkbox"/>	No <input type="checkbox"/>

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ☐ No ☐

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ☐ No ☐

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ☐ No ☐

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ☐ No ☐

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?

Yes ☐ No ☐

Addresses

Yes ☐ No ☐

Telephone numbers

Yes ☐ No ☐

Contact dates

Yes ☐ No ☐

Certification statement

Yes ☐ No ☐

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☐ No ☐ Comments

RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☐ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments _____

Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)? _____

Yes ☐ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs)).

Yes ☐ No ☒ NA ☐ (See "C.")

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☐ No ☒ NA ☐ (See "C.")

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☒ No ☐ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☒ Tanks
☒ Containers
 _____ Other (Identify inappropriate storage unit(s)). _____

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☐ No ☒ NA ☐ Some containers were not marked.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)* Yes ☒ No ☐ NA ☐Dioxin (TCLP) Yes ☐ No ☐ NA ☒California List (PFLT and/or total constituent analysis)* Yes ☒ No ☐ NA ☐First & Second Third (TCLP and/or total constituent analysis) Yes ☒ No ☐ NA ☐* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ☒ No ☐ Comments _____

- a. What date was the waste analysis plan last revised?

11-10-88

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site Except flyer printing

Identify off-site lab: HES Labs.

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ☐ No ☒ NA ☐ F-Solvents ~~are~~ clearly exceed standards.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes ☒ No ☐

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes ☒ No ☐ NA ☐

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ NA ☐

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ☒ No ☐

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ☒ No ☐ NA ☐

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ☐ No ☒ NA ☐

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ☐ No ☐ NA ☒

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ☐ No ☐ NA ☒

- b. More than one year [268.50(f)]?

Yes ☐ No ☐ NA ☒

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☒ No ☐ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
<u>P-1001 & P-1002</u>	<u>Physical & Chemical Separation</u>
<u>P-1003</u>	<u>& Settling</u>

3. Was dilution used as a substitute for treatment [268.3]?

Yes ☐ No ☒ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ☒ No ☐ Comments _____

Have treatment standards or prohibition levels been met?

Yes ☐ No ☒ Comments Not treating to reduce constituents.

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ☒ No ☐ NA ☐

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ☒ No ☐ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ☒ No ☐

17. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility
_____	_____
_____	_____
_____	_____
_____	_____

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ☒ No ___

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

Yes ☐ No ☐

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

Yes ☐ No ☐ NA ☐

5. Have the Subpart F groundwater monitoring requirements been met?

Yes ☐ No ☐ NA ☐

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

Yes ☐ No ☐

Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____Supernatant Yes ☐ No ☐ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ☐ No ☐

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ☐ No ☐ Comments _____

- a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ☐ No ☐

- b. Are residues subsequently managed in another surface impoundment?

Yes ☐ No ☐

- c. Are residues treated prior to disposal?

Yes ☐ No ☐ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site ☐ Off-site ☐

Identify waste code and treatment method:

<u>Waste Code</u>	<u>Treatment Method</u>
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ☐ No ☐ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ☐ No ☒

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ☐ No ☐

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☐ No ☐

If yes, at what frequency? _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ☐ No ☐

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ☐ No ☐ Comments _____

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ☐ No ☐

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

FO's

Facility:

Petrochem Services Inc. (Heritage Environmental Services)

U.S. EPA I.D. No. :

~~XXXXXXXXXX~~ / 0311620007

Street:

1 Stephen St. (Canal Bank Rd. NE) P.O. Box 337

City:

Lemont State: IL Zip: 60639

Telephone:

708-739-1150Owner/Operator:Water Reclamation District of Greater Chicago

Street:

100 E. Erie St.

City:

Chicago State: IL Zip: 60644

Telephone:

312-675-8099

Inspection Date:

~~XXXXXXXXXX~~ Time: 10:00 - 1:00pm

Weather Conditions:

Cloudy, 45°F

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OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Inspectors:

Name	Agency/Title	Telephone
<u>Mark Retzlaff</u>	<u>IEPA/EPs</u>	<u>708-345-9780</u>

Facility Representative:

Paul Zajec Plant Foreman (HES) 708-739-1150

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>✓</u>	<u> </u>	<u>✓</u>	<u>✓</u>	<u> </u>
Dioxin	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List	<u>✓</u>	<u> </u>	<u>✓</u>	<u>✓</u>	<u> </u>
First Third	<u>✓</u>	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
Second Third	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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Revised 10-20-89

- 9 APR 1990

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NOV 22 1989

Processes That Generate LDR Wastes

(See Narrative)



LDR Waste Management

Summary

No Apparent violations observed
See attache narrative

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0311620007 - Cook County
Heritage Environmental Services, Inc.
ILD 085349264
March 9, 1990

NARRATIVE

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. HES consists of two divisions. The first, Remediation Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES temporarily stores waste for DEA and formerly stored waste for IEPA ERU/DCI activities. Temporary storage of household hazardous waste collected in a program in Indianapolis, Indiana, has been discontinued.

The second division is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance PCB screening is performed while the waste is kept in any one of the storage tanks. Gravity separation occurs in Cone Bottom tanks. Solids collected in the bottom of the tanks are removed, and separated water is stored until it can be shipped to HES in Indiana. Non-separated oil water mixtures are then treated with heat in order to facilitate separation. The oil resulting from this process is hazardous waste fuel which is sold to cement kilns. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production.

HAZARDOUS WASTES

Hazardous Waste Fuel F001-F005

- Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burned in cement kilns.
- Rate of generation is approximately 500,000 gallons per year.
- Waste is sent to Systech in Indiana and Continental Cement in Missouri and burned in cement kilns.
- About 42,658 gallons are on-site in tank storage.

Used Oil and Oil/Water Mixtures - D008

- Waste is brought in from off-site and is waste that HES cannot treat.
- Rate of generation is about 60,000 gallons per year.
- Shipped off-site to HES in Indiana for treatment.
- 2051 gallons are currently on-site.

Waste Petroleum Naphtha - D001

- Generated from parts degreasers in the maintenance garage.
- Rate of generation is 30 gallons per month.
- Waste is sent to Safety Kleen in Mokena, IL for reclamation.
- 30 gallons are currently on-site.

Waste Flammable Solids - F003, D008

- Contaminated spill pads from emergency clean-ups. Also, consists of solids from supplemental fuel production.
- Rate of generation varies from year to year.
- Waste is shipped to CWM in Chicago for incineration.
- 44 drums are on-site.

Flammable Solids F001-F005

- Generated from strainer cleaning of secondary fuel blending process.
- Rate of generation is 25-50 55-gallon drums per year.
- Waste is shipped to Rollins Environmental in Louisiana for incineration.
- 11 drums are on-site.

Lab Pak Waste - D001, D002

- Generated from Westmont High School from discarded laboratory chemicals and chemical cleaners.
- Waste is not routinely generated, one time generation only.
- 14 drums of waste are currently stored on-site in trailer storage.

NON-HAZARDOUS SPECIAL WASTE

Crushed Drums

- RCRA empty 55 gallon drums.
- 6 loads are generated yearly.
- Shipped to CID #2 for landfilling.
- Currently less than one load on-site.

Solids

- Non-hazardous tank bottoms and soil from remediation activity.
- Rate of generation varies year to year.
- Shipped to CID #2 for landfilling.
- Less than one load on-site.

Waste Oil

- Non-hazardous loads not gravity separated.
- Rate of generation is about 75,000 gallons per year.
- Shipped to HES in Indiana for treatment.
- 2 drums on-site.

Treatment Water

- Rain water and water separated from non-hazardous oil streams.
- About 100,000 gallons generated yearly.
- Shipped to HES in Indiana for treatment.
- 28,751 gallons currently on-site.

REGULATED HAZARDOUS WASTE UNITS

Container Storage Area (S01)

Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete

pad. The trailers are used primarily for temporary storage of DEA wastes. DEA acts as the generator when the waste is sent off-site for incineration.

Trailer #

- #1. 2040 gal. - D001
- #2. 415 gal. - D001
- #3. 1825 gal. - D001
- #4. 535 gal. - D002
- #5. 115 gal. - Poisons (U and P)
- #6. 20 gal. - D002
- #7. 120 gal. - D001

Drum Storage Area (Diked) = 7,240 gal.

Tank Storage (SO2)

Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through St 6 tanks.

Waste Pile (SO3)

Waste Pile (SO3) activity appears on Part A, however, this activity has never occurred.

Tank Treatment (TO1)

Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.

Treatment in Containers (TO4)

Treatment in containers. Treatment in containers is not occurring at this time.

Note 1: Wastes going off-site for further treatment, incineration or reclamation are analyzed on the day of transport.

Note 2: A CAFO was issued on 9/26/85. No copy could be found in Region II files. Per previous inspector, HES has been in compliance with the CAFO for some time.

From the information obtained during this inspection, it appears that HES is a hazardous waste generator, treatment and storage facility.

0311620007 - Cook County
Heritage Environmental Services, Inc.
ILD085349264
March 9, 1990
Page 4

Apparent Violations

No apparent violations were observed during this inspection.

Subparts G and H were not addressed during this March 9, 1990 inspection.

MR:bh:4731B

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* F001 - F005

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☒ No ☐ List* D001, D002, D008

d. First and Second Third Wastes

Yes ☐ No ☐ List* P018, U129, P123, P001, U124, U036, U051, U188, U122, P037, U036, U061

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date -- 11/08/90).

Yes ☒ No ☐ Comments ERU, DCI, Cleanup

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

Yes ☒ No ☐ Comments ERU, DCI, Cleanup

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- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

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Revised 10-20-89

0881 89A 2 -

0881 89A 2 -

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
- ☒ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
U124, U036		
U051, U188		<input checked="" type="checkbox"/>
U122, P027		
U036, U061		<input checked="" type="checkbox"/>
P018, U129		
P23, P001		<input checked="" type="checkbox"/>

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

No PCB's

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☐ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☒ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste *and analysis* Yes ☒ No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☒ NA ☐

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☒ No ☐ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

F001-F005 9-15-89, D001, D002 2-22-89
D002 - 9-7-89

- pH \leq 2 Yes ☒ No ☐ NA ☐

List the wastes for which pH testing was used.

D002

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments Stored.

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F001- F005	Systech	Treated
F001- F005	Missouri: Cont. Cement	Treatment
D008	HES, IN.	Treatment

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

N/A

Waste Code	Facility

N/A

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No ☒ (If no, go to d)

p/w

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ☒ No ___ (If no, go to 4)

Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

- | | | | |
|-------|--|---|-----------------------------|
| (i) | EPA hazardous waste number | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (ii) | Applicable prohibition
[268.33(f), 268.34(h)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (iii) | Manifest number | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (iv) | Waste analysis data,
if available | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ☐ No ☒

Not Generated

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ☐ No ☐

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ☐ No ☐

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ☐ No ☐

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?

Yes ☐ No ☐

Addresses

Yes ☐ No ☐

Telephone numbers

Yes ☐ No ☐

Contact dates

Yes ☐ No ☐

Certification statement

Yes ☐ No ☐

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- ~~2.14~~ f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☒ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
U129, U036		
U061, U188	<u>Incinerator</u>	<u>Systech</u>
U122, P037	" "	" "
U036, U061		
P018, U129	" "	" "
P123, P001		

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☒ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☒ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☒ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☒ Comments _____

If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

N/A

- A. Does the transporter accumulate waste for more than 10 days
[268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored
for more than 10 days:

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

- C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent Yes ☒ No ☐ NA ☐
(TCLP)*Dioxin Yes ☐ No ☐ NA ☒
(TCLP)California List Yes ☒ No ☐ NA ☐
(PFLT and/or total constituent analysis)*First & Second Third Yes ☒ No ☐ NA ☐
(TCLP and/or total constituent analysis)* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ☒ No ☐ Comments Excess paint, pH

- a. What date was the waste analysis plan last revised?

11-8-88

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-siteIdentify off-site lab: Provided by generator

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ☐ No ☒ NA ☐

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ☒ No ☐ NA ☐

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☒ No ☒ NA ☐

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☒ No ☐ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☒ Tanks
☒ Containers
☐ Other (Identify inappropriate storage unit(s)). _____

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☒ No ☐ NA ☐

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes ☒ No ☐

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes ☒ No ☐ NA ☐

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ NA ☐

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ☒ No ☐

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ☒ No ☐ NA ☐

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ☐ No ☒ NA ☐

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ☐ No ☐ NA ☒

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored: *No PCBs*

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ☐ No ☐ NA ☒

- b. More than one year [268.50(f)]?

Yes ☐ No ☐ NA ☒

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☒ No ☐ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code

Treatment Processes

FOOT-FOOS

Heat treatment

3. Was dilution used as a substitute for treatment [268.3]?

Yes ☐ No ☒ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ☒ No ☐ Comments _____

Have treatment standards or prohibition levels been met?

Yes ☒ No ☐ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ☐ No ☒ NA ☐

N/A

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ☐ No ☐ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ☐ No ☐

7. Does the facility treat "soft hammer" wastes?

Yes ☐ No ☒ (If no, go to 8.)

- a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ☐ No ☐

- b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ☐ No ☐

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ☐ No ☐ NA ☐

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ☐ No ☐ NA ☐

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ☐ No ☐

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?

Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

Yes ___ No ___

Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

Sludge Yes ___ No ___ Waste Code _____

Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ___ No ___ Comments _____

- a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ___ No ___

- b. Are residues subsequently managed in another surface impoundment?

Yes ___ No ___

- c. Are residues treated prior to disposal?

Yes ___ No ___ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site _____ Off-site _____

Identify waste code and treatment method:

<u>Waste Code</u>	<u>Treatment Method</u>
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ___ No ___

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ___ No ___

If yes, at what frequency? _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ___ No ___ Comments _____

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

USEPA Number: [REDACTED] IEPA Number: 0311620007

Street: One Stephen St (NE CANAL BANK ROAD)
City: LEMON Telephone: (312) 739-1150
County: COOK State: IL Zip Code: 60439

Type of Facility: Notified as: G/TS/TR Regulated as: G/TS
LDF? _____ HPV? _____ 90 Day Follow-up required? Yes: _____ No: X

Region: Mywood Date of Inspection: [REDACTED] From: 9:30am to: 2:00pm
Weather (LDF Only): 35° DRY

ISS: X Sampling: Citizen Complaint: Closed: Other:
Record Review: Follow-up to Inspection of: Withdrawal:

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

Notification date, 8-19-80, from (initial) or (subsequent) Notif.

Initial Part A date: 1-12-81 Ammended: 11-8-88
Part A Withdrawal requested: — Approved by (US)(IL)EPA: —

Part B Permit called by (US)(II)EPA on: 5-6-88 Permit Due: 11-8-88
Part B Permit Submitted: 11-10-88 Draft Permit Issued: —

Has the firm been referred to: USEPA? Y IAG? - County SA? -
Date(s) of initial referral: 4-1-85 - - RECEIVED
USEPA CACO: 4-1-85 CAFO: 9-26-85 ALJ Decision: -
Referral to DOJ by USEPA: - Federal Court Order Issued: - APR - 7 1989
PCB Order Issued: - State Court Order Issued: -

EPA-DLPC

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?		Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report		
								87	86	85
S01	Y	N	Y		N	Y	N	Y	Y	Y
S02	Y	N	Y		N	Y	N	Y	Y	Y
S03	Y	N	N		N	N	N	N	N	N
T01	Y	N	Y		N	Y	N	Y	Y	Y
T04	Y	N	Y		N	N	N	Y	Y	N
	:				:					

WASTE DISPOSITION FORM : HAZARDOUS

Facility

e: Heritage Environmental Services Inc. USEPA #: 140085349264 IEPA #: 0311620007

Waste Name (Include haz & non-haz special & waste for which no deter- mination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analy- sis	USEPA Haz Waste #	On 8700 -12 *	On 3510 -3 *	On Annual Rpt. for			Amount on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
						87 *	87 *	86 *				
Hazardous Waste Fuel	Secondary Fuel Blending	3-16- 89	D001 F003 F005	Y	Y	Y	Y	Y	30,000 GALS	500,000 GALS PER YEAR	3-16- 89	BURNED IN CEMENT KILNS. EITHER SYSTEC (INDIANA) OR CONTINENTAL CEMENT (MISSOURI)
LOW FLASH TREATMENT WATER	WASTE WATER FROM TREATMENT OF HAZARDOUS WASTE	12-20- 88	D001	Y	Y	Y	Y	Y	10,000 GALS	15-20,000 GALS PER YEAR	12-20- 88	CENTURY RESO ES FOR DE-WATERING
USED OIL AND OIL / WATER MIXTURES	BROUGHT FROM OFF-SITE - UNABLE TO TREAT ON SITE	11-89	D008	Y	Y	Y	Y	Y	9800 GALS	60,000 GALS PER YEAR	1-11- 89	SENT TO HES IN INDIANAPOLIS FOR TREATMENT
TOX- AWAY WASTES	HOUSEHOLD HAZ. WASTE COLLECTION IN INDIANAPOLIS LAB- PACKED	Arrive on site lab packed Temp. storage	VARIES	Y	Y	Y	Y	Y	VARIES	VARIES	2-20- 89	TRADE WASTE INCINERATOR
WASTE PETROLEUM NAPHA	PARTS CLEANER IN GARAGE		D001	Y	Y	Y	Y	Y		30 GALS PER MONTH	2-17- 89	SAFETY KILN FOR RECLAMATION
WASTE FLAMMABLE SOLIDS	SPILL PADS FROM CLEANUPS FROM ERU AN IN SUPPL. FUEL PRODU.	11-1- 88	D001 F003 D008	Y	Y	Y	Y	Y	269 drums	VARIES	11-1- 88	C W M IN CHICAGO FOR INCINERATION
FLAMMABLE SOLIDS	STRAINER CLEANINGS IN SECONDARY FUEL BLENDING PROCESS	1-26- 89	F002 F003 F005	Y	Y	Y	Y	Y	9-55gal strainer drums	25-50 55gal drums	1-26- 89	ROSS INCINERATOR IN OHIO

* All "No" responses must be explained in the narrative.

WASTE DISPOSITION FORM : NON - HAZARDOUS

Facility

- Heritage Environmental Services Inc.

USEPA #: 1LD085349264

IEPA #: 0311620007

[illegible]

* All "No" responses must be explained in the narrative.

0311620007
March 16, 1989

NARRATIVE

Heritage Environmental Services, Inc. (HES) is a generator, treater and storer of hazardous waste. Transporter activities are performed through HES Indianapolis headquarters. The company consists of two divisions. The first, Remediation/Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES also temporarily stores hazardous waste from IEPA ERU/DCI activities and TOX-Away, an Indianapolis, Indiana program for household hazardous wastes. The second is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance it is stored in the Vacuum Receiving tanks (VR) where it is held until PCB screening is completed. The waste then goes into Cone Bottom (CB) tanks where gravity separation occurs. Solids collected from the bottom of these tanks are stored in CB 4, while separated water is stored in CB 3. Oils and water are put into Heat/Treatment (HT) tanks where they are heated to facilitate oil and water separation. The resulting hazardous waste fuel is stored in Oil Storage tanks (OS) where it is held prior to sale to cement kiln burners. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production.

Hazardous Wastes Generated

Note #1 - Wastes going off-site for further treatment, incineration, reclamation or burning are analyzed on the day of transport.

Hazardous Waste Fuel - D001, F003, F005. Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burnt in cement kilns. Two kilns purchase this fuel: Systec in Indiana and Continental Cement in Missouri. There were 30,000 gallons on-site. Approximately 500,000 gallons are generated yearly. The last shipment was to Continental Cement on March 16, 1989.

Low Flash Water - D001. Waste water from the treatment of hazardous waste. There were 10,000 gallons on-site. 15-20,000 gallons are generated per year. The last manifested shipment was December 20, 1988. It was sent to Century Resources for de-watering.

Used Oil and Oil/Water Mixtures - D008. Waste brought on-site from off-site that the facility was unable to treat. There were 9,800 gallons on-site. Approximately 60,000 gallons are generated yearly. The last manifested shipment was on January 11, 1989 and went to HES in Indianapolis for treatment.

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IEPA-DLPC

TOX-Away Wastes - The types and amounts of hazardous waste varies. The waste is part of a household hazardous waste collection program in Indianapolis, Indiana. It arrives and remains lab-packed while on-site. The last manifested shipment was February 20, 1989 and went to Trade Waste Incinerator.

Waste Petroleum Naptha - D001. Generated in a parts cleaner in the maintenance garage. 30 gallons are generated monthly. It is transported and treated via a reclamation agreement with Safety Kleen. The last manifested shipment was February 17, 1989.

Waste Flammable Solids - D001, F003, D008. Spill pads from emergency response and solids from supplemental fuel production. The rate of generation varies. There were 269-55 gallon drums on-site. The last manifested shipment was November 1, 1988 and went to CWM in Chicago for incineration.

Flammable Solids - F002, F003, F005. Generated during strainer cleaning in secondary fuel blending process. There were 9-55 gallon drums on-site. 25-50 drums are generated yearly. The last shipment was January 26, 1989 and went to Ross incinerator in Ohio.

Non-Hazardous Wastes Generated

Crushed Drums - RCRA empty 55 gallon drums. There was one load on-site. Each load is approximately 300 drums. Six loads are generated yearly. The last manifested shipment was November 15, 1988 and was landfilled at CID #2.

Solids - Non-hazardous tank bottoms and soil from Emergency Response clean-ups. There wasn't any on-site. The rate of generation varies. The last manifested shipment was December 1, 1988 and was landfilled at CID #2.

Waste Oil - Non-hazardous loads that were not gravity separated. There were 30,000 gallons on-site. Approximately 75,000 gallons are generated per year. The last manifested shipment was February 7, 1989 and went to HES in Indianapolis for treatment.

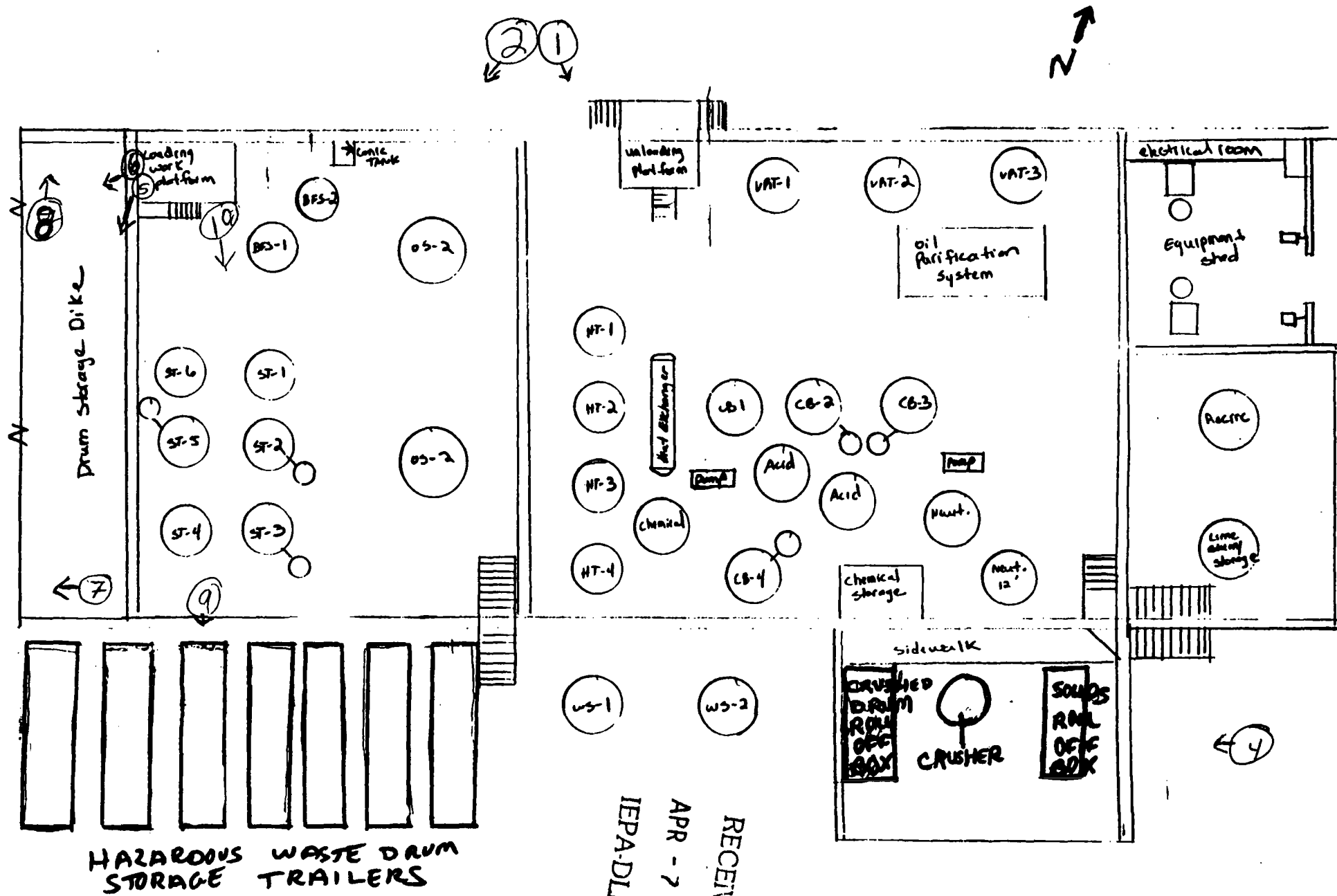
Treatment Water - Rain water and water separated from non-hazardous oil streams. There were 30,000 gallons on-site. Approximately 100,000 gallons are generated per year. The last manifested shipment was February 2, 1989 and went to HES in Indianapolis for further treatment.

Hazardous Waste Units

- S01 - Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete pad. The trailers are used primarily for temporary storage of IEPA/DEA wastes. IEPA/DEA acts as the generator when the waste is sent off-site for incineration.
- S02 - Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through ST 6 tanks.
- T01 - Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.
- T04 - Treatment in containers. Treatment in containers is not occurring at this time.

Apparent Violations

There were no apparent violations.



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APR - 7 1989
IEPA-DIFC

Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *CG*

City: Lemont

IEPA #: 0311620007

Site Name:

Heritage Environmental
Services Inc.

Comments: _____

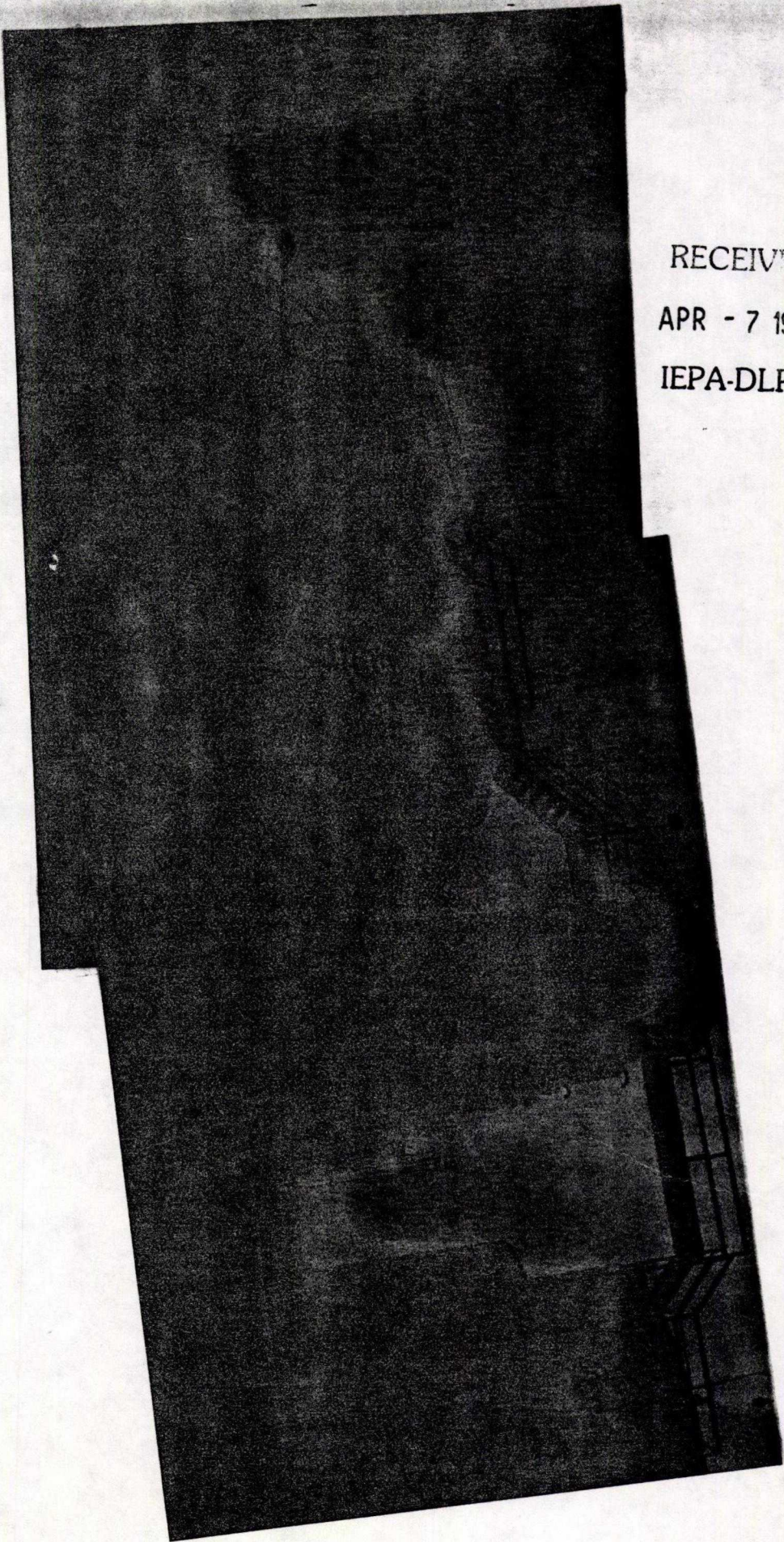
HAZARDOUS & NON -

HAZ. TREATMENT &

STORAGE TANKS

FACING SOUTHEAST

Photo #: 1 Roll #: 89-191



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APR - 7 1989

IEPA-DLPC

Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *CG*

City: Lemont

IEPA #: 0311620007

Site Name:

Heritage Environmental
Services Inc.

Comments: _____

Photo #:

Roll #:

Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *CRS*

City: Lemont

IEPA #: 0311620007

Site Name:

Heritage Environmental
Services Inc.

Comments: _____

HAZARDOUS & NON-

HAZ TREATMENT

AND STORAGE TANKS

FACING SOUTH WEST

Photo #: 2 Roll #: 2191

Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *CRS*

City: Lemont

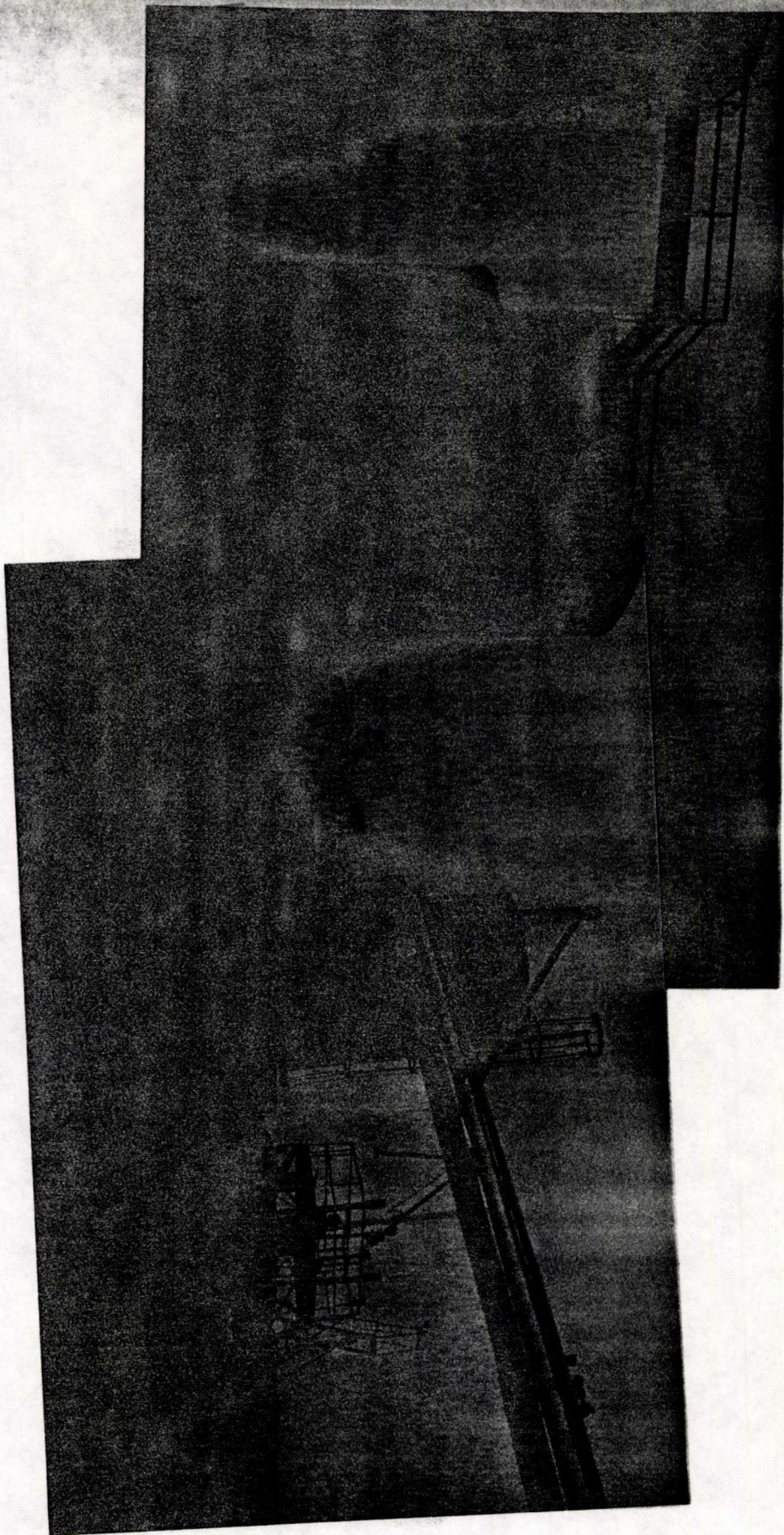
IEPA #: 0311620007

Site Name:

Heritage Environmental
Services Inc.

Comments: _____

Photo #: _____ Roll #: _____



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *OGW*

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.

Comments: _____

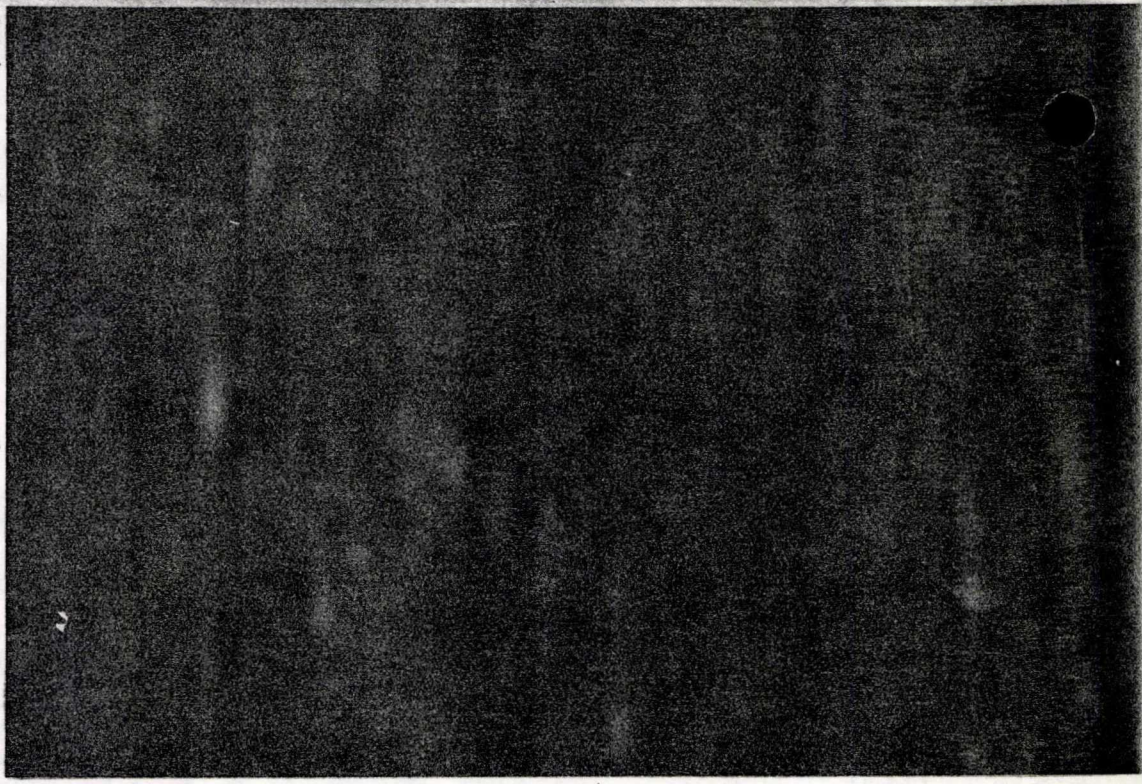
HAZARDOUS & NON. HAZ

WASTE TREATMENT &

STORAGE TANKS

FACING NORTHWEST

Photo #: 3 Roll #: 89-191



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *OGW*

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.

Comments: _____

SOLIDS ROLL-OFF

BOX, DRUM CRUSHER

AND CRUSHED DRUM
ROLL OFF BOX.

FACING WEST

Photo #: 4 Roll #: 89-191



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 0311620007

Site Name:

Heritage Environmental
Services Inc.

Comments: AERIAL VIEW

OF DRUM STORAGE AND

HAZ. WASTE STORAGE

TRAILERS

FACING SOUTH

Photo #: 5 Roll #: 89-214



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 0311620007

Site Name:

Heritage Environmental
Services Inc.

Comments: AERIAL VIEW

OF DRUM STORAGE

AREA

FACING SW

Photo #: 6 Roll #: 89-214



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *CRG*

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.

Comments:

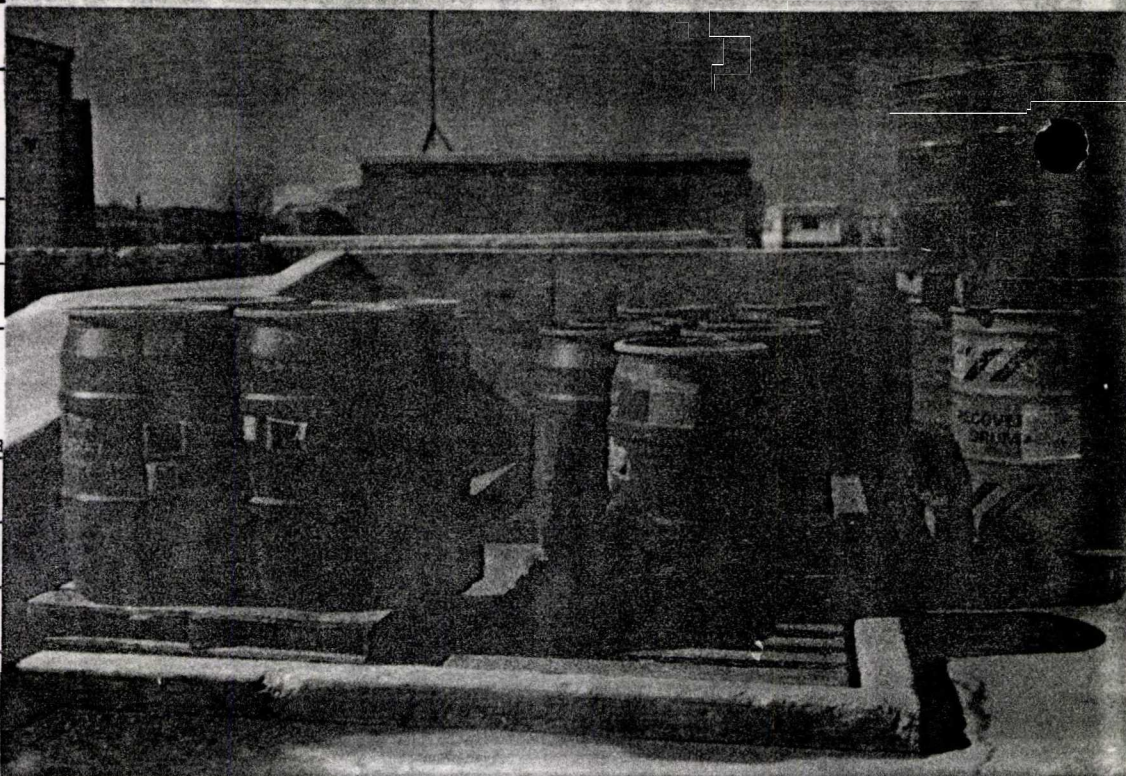
DRUM STORAGE AREA

FOR CORROSIVE

WASTES

FACING NORTH

Photo #: 7 Roll #: 89-216



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer *CRG*

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.

Comments:

DRUM STORAGE

AREA FOR ACID

WASTES

FACING WEST

Photo #: 8 Roll #: 89-216



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.

Comments:

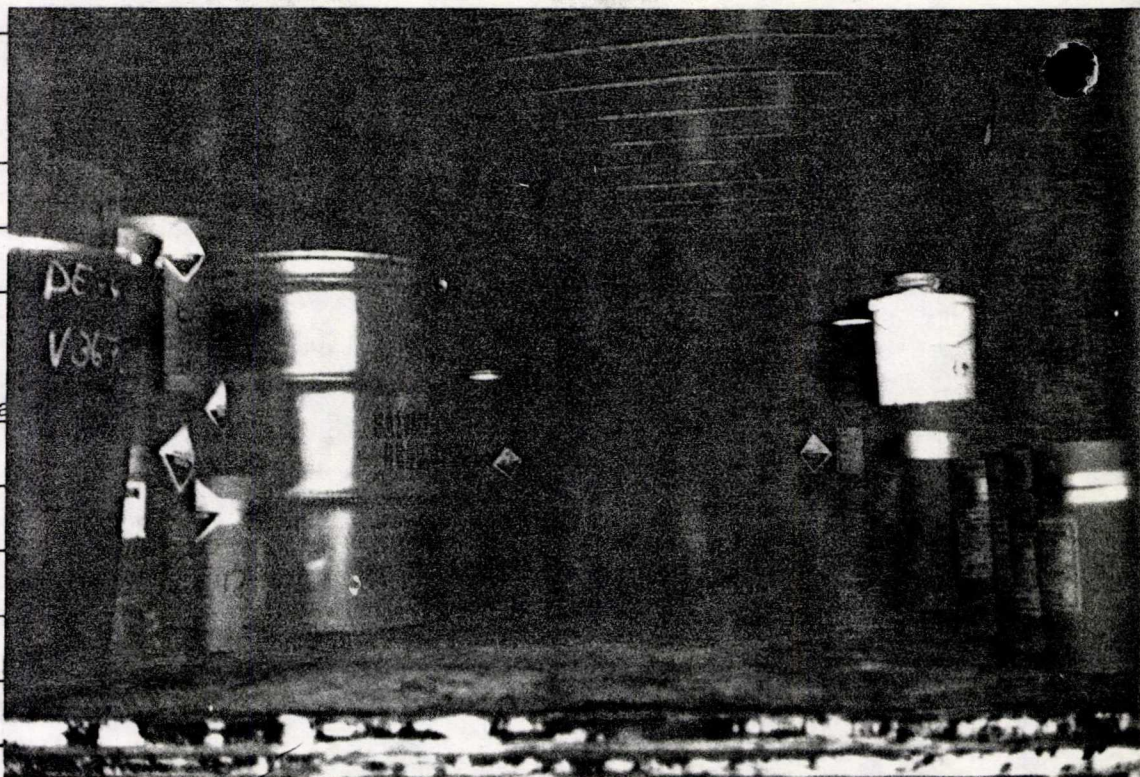
INSIDE OF

CORROSIVE DRUM

STORAGE TRAILER

FACING SOUTH

Photo #: 9 Roll #: 89-214



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.

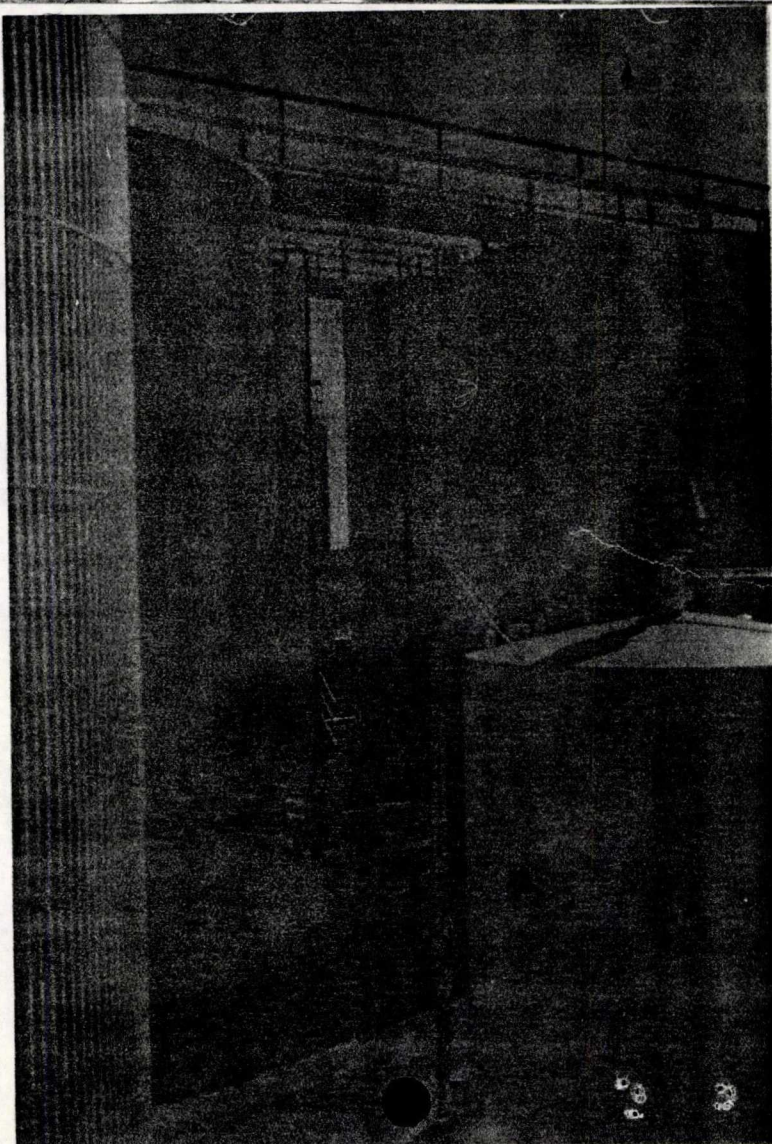
Comments:

STORAGE & TREATMENT

TANKS.

FACING SOUTH

Photo #: 10 Roll #: 89-214



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	<input checked="" type="checkbox"/>			
			a Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>					

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____ Is the facility only operating with a RCRA permit? Yes ____ No ____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			X	NOT A NEW FACILITY
OTH	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <input checked="" type="checkbox"/> No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <input checked="" type="checkbox"/> No ____ N/A ____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	X			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1			Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	<input checked="" type="checkbox"/>			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

GEN-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			


GEN-B-2

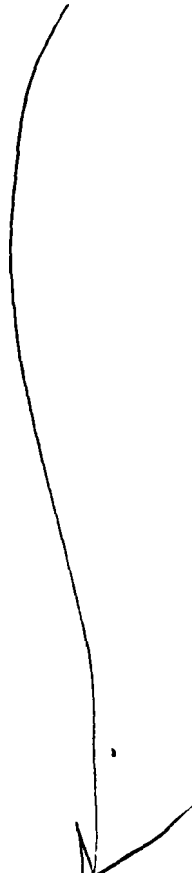
Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>NO BULK SHIPMENTS BY RAIL OR WATER</p>

GEN-B-3

Area	Class	30 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				
OTH	1	X		Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?	X			
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?	X			
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes <u>X</u> No <u> </u> b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes <u>X</u> No <u> </u> - The manifest document number associated with the container? Yes <u> </u> No <u>NA</u> <u>X</u> - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes <u>X</u> No <u> </u>	X			WASTE MARKED ACCORDINGLY ALTHOUGH IT IS NOT READY FOR IMMEDIATE TRANSPORT


GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				Sub Sec		Yes	No		
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			X	TRANSPORTER PROVIDES PLACARDS
OTH	1	X			Section 722.134: Accumulation Time NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist. Condition of Containers (Section 725.271) Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ____ No ____ N/A ____			X	ALL STORED WASTE IN CONTAINERS + TANKS ARE IN PERMITTED STORAGE AREA - SEE TSD CHECKLIST 

Area	Class	O Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes _____ No _____ N/A _____ - Complying with the requirements of: <ul style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes _____ No _____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes _____ No _____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes _____ No _____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes _____ No _____ 				<p align="center">NO SATELLITE ACCUMULATION</p> 

GEN-C-26

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Section 722.141: Annual Reporting</p> <p>Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?</p> <p>NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.</p>	<input checked="" type="checkbox"/>			
MAN	1			<p>Section 722.142: Exception Reporting</p> <p>a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____</p> <p>b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes _____ No _____</p> <p>b Does any exception report submitted to the Director contain the following:</p> <ul style="list-style-type: none"> - A legible copy of the manifest for which the generator does not have confirmation of delivery; and 			<input checked="" type="checkbox"/>	NONE REQUIRED

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>			X	 NONE REQUIRED
				<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>PART 722 GENERATOR STANDARDS</p> <p>Subpart E: Exports of Hazardous Waste</p> <p>Section 722.152: General Requirements</p> <p>Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ____</p> <p>NOTE: If "No", skip Subpart E. If "Yes", answer the next question.</p> <p>Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____</p> <p>NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.</p>			X	NO EXPORTS

GEN-E-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			<input checked="" type="checkbox"/> NO IMPORTS	
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
			b2	Has the importer or his agent signed the manifest in place of the generator; and				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2	X		<p>PART 722 GENERATOR STANDARDS Subpart G: Farmers</p> <p>Section 722.170: Farmers</p> <p>Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:</p> <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>			X	NO FARMING

GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions				
				Section 725.101: Purpose, Scope and Applicability	X			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ___ No <u>X</u>				
				NOTE: If "Yes", explain in narrative.				
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ___ No <u>X</u>				

TSD-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	<input checked="" type="checkbox"/>			NO SUCH ARRANGEMENTS
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes <input checked="" type="checkbox"/> No _____ N/A _____				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No _____	<input checked="" type="checkbox"/>			

TSD-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b	<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			c	<p>Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements a Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> a Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b1 Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b2 Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b3 Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b4 Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				NO EVIDENCE OF SUCH

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	2				<ul style="list-style-type: none"> - A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The date and nature of any type of corrective action? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 				NONE NOTED OR APPARENTLY NEEDED
					<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				NOT A DISPOSAL FACILITY

TSD-B-9

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					e Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
					a Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					a Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-10

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			<input checked="" type="checkbox"/>	NO SALT LANDFORMS

TSD-B-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			alarm system Telephone

TSD-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

NO SUCH
REFUSALS

TSD-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2			Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				<p>Lemont Fire Dept Lemont Police Cook County Sheriff Silver Cross Hosp. Palos Comm. Hosp.</p>

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			THE PLAN HAS NOT FAILED IN AN EMERGENCY NO MAJOR DESIGN CHANGES
OTH	2			Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-4

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr		Yes	No		
OTH	1/2		Sub Sec	<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>				
								<p>9/1/88 THE SHREDDER UNIT WAS ON FIRE AND CAUSED NEARBY OFF-SPEC CONSUMER PRODUCTS AWAITING SHREDDING TO IGNITE. CONTINGENCY PLAN WAS PUT INTO EFFECT WITHIN MINUTES. ALL NECESSARY AGENCIES WERE NOTIFIED. A REPORT WAS SUBMITTED TO IEPA.</p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting	<input checked="" type="checkbox"/>			
				Section 725.171: Use of Manifest System				
				Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>							
a3	3) Immediately give one copy of the completed manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							
a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							
a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							


TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A <u>X</u></p> <p>Does the facility initiate shipments of hazardous waste? Yes <u>X</u> No ____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>	<u>X</u>			NO RAIL OR WATER SHIPMENTS
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes <u>X</u> No ____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes <u>X</u> No ____</p>				


TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
				a Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b Does the operating record contain the following information:				
				1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				4) The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NOT A DISPOSAL FACILITY

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				<p>NONE OF THESE UNITS</p> 

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				<p>N/A NOT A DISPOSAL FACILITY</p> 

TSD-E-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			NOT A DISPOSAL FACILITY
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.174: Availability, Retention and Disposition of Records				
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				NOT A DISPOSAL FACILITY ↓
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNRESOLVED ENFORCEMENT ACTION

TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	2				Section 725.175: Annual Report	<input checked="" type="checkbox"/>			
					Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1				Section 725.176: Unmanifested Waste Report	<input checked="" type="checkbox"/>			
					Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
					Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
					Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
					Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input type="checkbox"/> No <input type="checkbox"/>				
									NO HAZ WASTE ACCEPTED WITHOUT A MANIFEST ↓

TSD-E-7



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____</p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	<input checked="" type="checkbox"/>			<p>✓</p> <p>NOT A DISPOSAL FACILITY</p> <p>NOT UNDER GOING CLOSURE</p>
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

TSD-E-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements	<input checked="" type="checkbox"/>			
			Section 725.212: Closure Plan a Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 					

NO CLOSURE AT THIS TIME

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____ - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____ 				 NOT A DISPOSAL FACILITY
				Section 725.218: Post-Closure Plan a Was the most current facility post-closure plan available during the inspection? Yes ____ No ____ Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____			X	
FIN	1			Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility? NOTE: If no closure plan, mark "N/A".	X			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? NOTE: If no post-closure plan, mark "N/A".			X	NOT A DISPOSAL FACILITY 

TSD-G/H-2

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr Sub Sec		Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
OTH	1	X		Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	X			
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	X			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <u>X</u> No <u> </u> b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>X</u> No <u> </u>	X			
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <u>X</u> No <u> </u>	X			


TSD-I-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	X			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	X			


TSD-I-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: Failing the filter test means that the waste contains free liquids.	<input checked="" type="checkbox"/>			
			a	Section 725.291: Assessment of Existing Tank Systems For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				

TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>				<p>NO NEW TANKS</p> 
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>				


TSD-J-2

Area	Class	O Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			 THESE WASTES NOT STORED ON SITE SECONDARY CONTAINMENT PROVIDED FOR ALL TANKS -
				Section 725.293: Containment and Detection of Releases				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				

TSD-J-3

Area	Class	O Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) <u>a vault</u>; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4

Area	Class	O Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NO UNDERGROUND TANKS 

TSD-J-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			NO UNCOVERED TANKS NO KNOWN LEAKS OR SPILLS
OTH	2			Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).			<input checked="" type="checkbox"/>	

TSD-J-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes _____ No _____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes _____ No _____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes _____ No _____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes _____ No _____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was immediately contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes _____ No _____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes _____ No _____ N/A _____</p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p>				

TSD-J-7

Area	Class	IO Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>			<input checked="" type="checkbox"/>	NO CLOSURE
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

TSD-J-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>			<input checked="" type="checkbox"/>	INCOMPATIBLES NOT STORED OR TREATED IN SAME TANK SYSTEM

TSD-J-9

Area	Class	O Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			X	CHEMICAL TREATMENT NOT OCCURRING IN TANKS AT THIS TIME. WASTES IN TANKS ESSENTIALLY SIMILAR
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes _____ No _____ N/A _____ or				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes _____ No _____ N/A _____ NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.				

TSD-J-10

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	Apparent Compliance? Yes No N/A			Remarks or Comment Numb.
			<p>Part 726</p> <p>STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIFIC TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES</p> <p>Subpart D Hazardous Waste Burned For Energy Recovery</p> <p>Section 726.131 Prohibitions</p> <p>Is the person who markets hazardous waste fuel marketing it to only:</p> <p>a) 1) Persons who have notified of their hazardous waste fuel activities under Sec. 3010 of RCRA and who have obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) 2) Persons who burn the fuel in boilers or industrial furnaces identified in Sec. 726.131 (b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>c) Is the cement kiln which burns fuel which contains hazardous waste:</p> <p>1) Outside the boundaries of any incorporated municipality with a population greater than 500,000? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) In compliance with the requirements of 35 Ill. Adm. Code 702, 703, 725 (724) applicable to incinerators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If the answer to the first question is "No", then for the facility to be in compliance, the answer to the second must be "Yes". If the answer to the first is "Yes", then the answer to the second could be "Yes", "No", or "N/A".</p>	<input checked="" type="checkbox"/>			<p>SYSTEC - INDIANA</p> <p>CONTINENTAL CEMENT - MISSOURI</p>

REC-D-1

4

Area	Day F/U	Sub- sec	Requirement	Compliance?			Remarks or Comment Number
				Yes	No	N/A	
			<p>Section 726.132 Standards Applicable To Generators of Hazardous Waste Fuel.</p> <p>Is a generator of hazardous waste that is used as a fuel or used to produce a fuel in compliance with the requirements in 35 Ill. Adm. Code 722? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Note: Complete the generator portion of the inspection report before answering the above question. Generators who market hazardous waste fuels to burners are also subject to Sec. 726.134. Generators who are also burners are subject to 726.135.</p>	<input checked="" type="checkbox"/>			
			<p>Section 726.133 Standards Applicable To Transporters of Hazardous Waste Fuel.</p> <p>Is the transporter of hazardous waste that is used as a fuel or used to produce a fuel in compliance with the requirements of 35 Ill. Adm. Code 723? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Note: Complete the transporter portion of the inspection report before answering the above question.</p>			<input checked="" type="checkbox"/>	NOT A TRANSPORTER
			<p>Section 726.134 Standards Applicable To Marketers Of Hazardous Waste Fuels.</p> <p>Note: Prior to completing this section carefully review the definition of "marketers of hazardous waste fuels."</p>	<input checked="" type="checkbox"/>			

REC-13-2

DEC 11 2011

5

Area	90 Day F/U	Key Ltr Sub-	Requirement	In Apparent Compliance?			Remarks or Comment Humb.
				Yes	No	N/A	
		sec					
		a)	Is the marketer complying with the prohibitions in Section 726.131? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
		b)	Has the marketer specifically notified under Sec. 3010 of RCRA regarding his activities as a marketer of hazardous waste fuels? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
		c)	Is a marketer who also stores hazardous waste fuels in compliance with the applicable provisions of 35 Ill. Adm. Code 702, 703, 722.134, 725 (724) Subparts A thru L? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			Note: Complete the applicable TSD Sections of the inspection report before answering the above question.				
		d)	If the marketer ships hazardous waste fuel off site is he complying with the standards for generators in 35 Ill. Adm. Code 722? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			Note: Complete the generator portion of the inspection report before answering the above question.				
		e)	Prior to receiving or making of hazardous waste fuel has the marketer received or provided the certification required in Sec. 726.134 (e)(1) or (2)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
		f)	Is the marketer maintaining the certifications received or rendered in the above question for a period of three years from the date the marketer last engages in				

REC-11-7

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
			<p>a hazardous waste fuel marketing transaction with the person who sends or receives the certification notice? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 726.135 Standards Applicable To Burners Of Hazardous Waste Fuel</p> <p>Note: Prior to completing this section, carefully review the definitions of industrial furnaces & boilers in 35 Ill. Adm. Code 720.110 & 35 Ill. Adm. Code 726.131.</p> <p>a) Is the owner or operator of the industrial furnace or boiler complying with the prohibitions in Sec. 726.131? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>b) Has the owner or operator of the industrial furnace or boiler specifically notified of his activities as a burner of hazardous waste fuels under Sec. 3010 of RCRA? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Is the owner or operator of the industrial furnace or boiler who stores hazardous waste fuels in compliance with:</p> <p>c) 1) 1) The requirements of 35 Ill. Adm. Code 722.134 for the short term accumulation of hazardous waste fuel on site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) 2) 2) The requirements of 35 Ill. Adm. Code 725, Subparts A thru L for existing storage facilities? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				<p>NOT A BURNER OF HAZARDOUS WASTE FUEL</p>



March 22, 1989

Carol A. Graszer
Environmental Protection Specialist
1701 South First Avenue
Suite 600
Maywood, IL 60153

Dear Carol:

Enclosed are Continental Cement's and Systech Corp.'s
"Notification of Hazardous Waste Activity" you requested.

If you need more information please call.

Sincerely,

Paul A. Zajec
Plant Supervisor

PAZ/kn
Enc.

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

RECEIVED
MAR 22 1989

RECEIVED
MAR 22 1989

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

RECEIVED

APR - 7 1989

IEPA-DLPC

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439
Telephone 312/739-1150

CONTINENTAL CEMENT
CONTINENTAL CEMENT COMPANY INC.

P O Box 71

Hannibal, Missouri 63401

(314) 221-1740
Telex 434-308

February 13, 1987

Petrochem Services, Inc.
P.O. Box 337
Lemont, IL. 60439

RECEIVED
MAR 32 1989

Dear Mr. Smith:

This letter is to inform you that Continental Cement Co. has notified the United States Environmental Protection Agency under section 3010 of RCRA and that your fuel will be burned in a cement kiln.

Sincerely yours,

Dave Fox

Dave Fox
Quality Control Superintendent

DLF:jm



INSTRUCTIONS: Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested here is required by law, (Section 3010 of the Resource Conservation and Recovery Act).

OR OFFICIAL USE ONLY

COMMENTS																								
C																								
INSTALLATION'S EPA I.D. NUMBER															APPROVED					DATE RECEIVED (yr, mo, & day)				
F															I									
I. NAME OF INSTALLATION																								
CONTINENTAL CEMENT COMPANY INC.																								
II. INSTALLATION MAILING ADDRESS																								
STREET OR P.O. BOX																								
3 P.O. BOX 71																								
CITY OR TOWN																								
HANNIBAL																								
ST. ZIP CODE																								
MO 63401																								
III. LOCATION OF INSTALLATION																								
STREET OR ROUTE NUMBER																								
5 HWY 79																								
CITY OR TOWN																								
HANNIBAL																								
ST. ZIP CODE																								
MO 63401																								
IV. INSTALLATION CONTACT																								
JOB TITLE																								
PHONE NO. (area code & no.)																								
2 RICHARD ALTHEIDE, PLANT MANAGER 314-221-740																								
OWNERSHIP																								
A. NAME OF INSTALLATION'S LEGAL OWNER																								
CONTINENTAL CEMENT COMPANY INC.																								
B. TYPE OF OWNERSHIP (enter the appropriate letter into box)																								
F - FEDERAL M - NON-FEDERAL																								
M																								

DECEIVE

VI. TYPE OF WASTE ACTIVITY (enter "X" in the appropriate box(es))

A. HAZARDOUS WASTE ACTIVITY

B. WASTE-AS-FUEL ACTIVITIES

- ☐ 1. GENERATION
- ☐ 2. TRANSPORTATION
- ☒ 3. TREAT/STORE/DISPOSE
- ☐ 4. UNDERGROUND INJECTION
- ☐ 5. MARKET OR BURN HAZARDOUS WASTE FUELS (see Part B)

- ## 6. GENERATOR MARKETING TO BURNER

<input type="checkbox"/>	Hazardous Waste Fuel
<input type="checkbox"/>	Used Oil Fuel

7. OTHER MARKETER

11	Hazardous Waste Fuel
12	Used Oil Fuel

8. BURNER (see ITEM VII)

<input checked="" type="checkbox"/>	Hazardous Waste Fuel
<input type="checkbox"/>	Used Oil Fuel

VII. WASTE FUEL BURNING: TYPE OF COMBUSTION DEVICE (Enter "X" in all appropriate boxes to indicate types of combustion device(s) in which hazardous waste fuel or used oil fuel is burned. See instructions for definitions of waste fuels)

II UTILITY BOILER

II INDUSTRIAL BOILER

TX INDUSTRIAL FURNACE

CONTINUE ON REVERSE

RECEIVED
MAR 32 1989

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

ACCT

REC'D. JUL 10 1987

APPROVED

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR ☐ B. RAIL ☒ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify):

IX. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

MD 111288

X. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 2 1 0	U 2 1 3	U 2 2 0	U 2 2 6	U 2 2 8	U 2 3 9
37	38	39	40	41	42
U 0 7 0	U 0 7 7	U 2 2 7	U 0 0 3	U 1 8 8	
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Part 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D004 - D017)

XI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (Type or print)

DATE SIGNED

Frank C. Stevens, President

2/3/86

EPA Form 8700-12 (6-80) REVERSE

BILLING CODE 6560-60-C

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR ☐ B. RAIL ☒ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify)

IX. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

MOD 054 018288

X. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
01 - 10	11 - 20	21 - 30	31 - 40	41 - 50	51 - 60
7	8	9	10	11	12
61 - 70	71 - 80	81 - 90	91 - 00	01 - 10	11 - 20

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
21 - 30	31 - 40	41 - 50	51 - 60	61 - 70	71 - 80
19	20	21	22	23	24
81 - 90	91 - 00	01 - 10	11 - 20	21 - 30	31 - 40
25	26	27	28	29	30
41 - 50	51 - 60	61 - 70	71 - 80	81 - 90	91 - 00

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 1 1 2	U 1 1 3	U 1 1 7	U 1 1 8	U 1 2 1	U 1 2 4
37	38	39	40	41	42
U 1 2 5	U 1 4 0	U 1 5 2	U 1 5 3	U 1 5 4	U 1 5 6
43	44	45	46	47	48
U 1 5 9	U 1 6 1	U 1 6 2	U 1 6 5	U 1 7 1	U 1 8 6
49	50	51	52	53	54
55 - 60	61 - 70	71 - 80	81 - 90	91 - 00	01 - 10

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
55 - 60	61 - 70	71 - 80	81 - 90	91 - 00	01 - 10

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.51 - 261.54)

☒ 1. IGNITABLE
(D001)☐ 2. CORROSIVE
(D002)☐ 3. REACTIVE
(D003)☐ 4. TOXIC
(D004 - D017)

XI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (Type or print)

DATE SIGNED

Frank C. Stevens, President

2/3/86

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR ☐ B. RAIL ☒ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify):

IX. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION ☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.
MOD054018288

X. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F003	2 F005	3 D001	4 F001	5 F002	6 F004
7 D005	8 D006	9 D007	10 D008	11 D009	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K022	14 K048	15 K049	16 K052	17 K086	18 K085
19 K095	20 K096	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U001	32 U002	33 U008	34 U019	35 U031	36 U037
37 U045	38 U051	39 U052	40 U055	41 U056	42 U057
43 U069	44 U080	45 U088	46 U092	47 U102	48 U110

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D004 - D017)

XI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (Type or print)	DATE SIGNED
	Frank C. Stevens Frank C. Stevens, President	2/3/86

SYSTECH[®]

SYSTEMS TECHNOLOGY CORPORATION

246 North Valley Road

Xenia, Ohio 45385

Area Code 513/372-8077

Dayton Toll Free 429-2533

RECEIVED
MAR 32 1989

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHDD005048997

INSTALLATION ADDRESS

GENERAL PORTLAND INC PAULDING PLANT

PO BOX 109

PAULDING

OR

45879

PO BOX 109

PAULDING

OR

45879

EPA Form 8700-12A (4-80)

SYSTEMS TECHNOLOGY CORPORATION

Joseph J. Durczynski

Joseph J. Durczynski

Project Coordinator

Subsidiary of Systems Research Laboratories, Inc.

in the unshaded areas & spaced for elite type, i.e.,

factory/inh).

Form Approved OMB No. 155-R0175



U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permit Program
(Read the "General Instructions" before starting.)

EPA I.D. NUMBER

FI 110006419212

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-8 which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any question, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK IN			SPECIFIC QUESTIONS	MARK IN		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility test, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1. SKIP GREENCASTLE CEMENT PLANT

IV. FACILITY CONTACT

NAME & TITLE (last, first, & title) 2. NANFOSSEN DALE PLANT MANAGER
PHONE (area code & no.) 317 653 9766

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX 370 BOX 482
CITY OR TOWN 4. GREENCASTLE
STATE 5. IN ZIP CODE 6. 4613

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5. PUTNAMVILLE ROAD
COUNTY NAME 7. PUTNAN
CITY OR TOWN 8. CLIME DALE
STATE 9. IN ZIP CODE 10. 46135

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

VILSIG CODES (4-digit, in order of priority)

A. FIRST

B. SECOND

7 3 2 4 1 (specify) PORTLAND CEMENT MANUFACTURER

7 (specify)

C. THIRD

D. FOURTH

7 (specify)

7 (specify)

VIII. OPERATOR INFORMATION

A. NAME

LONE STAR INDUSTRIES

Is the name listed Item VIII-A also the owner?

☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F - FEDERAL
S - STATE
P - PRIVATEM - PUBLIC (other than federal or state)
O - OTHER (specify)

P (specify)

D. PHONE (area code & no.)

E. STREET OR P.O. BOX

P O BOX 90765

F. CITY OR TOWN

HOUSTON

G. STATE H. ZIP CODE

TX 77290

IX. INDIAN LAND

Is the facility located on Indian land?

☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

B. PSD (Air Emissions from Proposed Sources)

9 IN I N O O 0 1 2 7 9

9 P

C. UIC (Underground Injection of Fluids)

D. OTHER (specify)

9 UI 67-07-89-0096 (specify) -0097; -0098; -0099; -0100

E. RCRA (Hazardous Wastes)

F. OTHER (specify)

9 RI I N D O 0 6 4 1 2 1 2

9 I

(specify) 5 AIR POLLUTION OPERATION PERMIT

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. SEE ATTACHMENT 1 MAP

XII. NATURE OF BUSINESS (provide a brief description)

THE GREENCASTLE CEMENT PLANT PRODUCES PORTLAND CEMENT FROM A RAW LIMESTONE AND SHALE SLURRY MIX IN A ROTARY KILN. COAL IS USED TO FIRE THE KILN. A SUPPLEMENTAL FUEL, DERIVED FROM HAZARDOUS WASTES WILL BE USED. A STORAGE FACILITY TO HANDLE THE RECYCLED FUEL IS UNDER CONSTRUCTION. CLINKER, THE PRODUCT OF THE KILN, IS GROUND INTO A FINE POWDER. THIS POWDER IS MARKETING AS PORTLAND CEMENT.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law: that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)

M. MICHAEL REID
VICE PRESIDENT

B. SIGNATURE

M. Michael Reid

C. DATE SIGNED

5/2/86

COMMENTS FOR OFFICIAL USE ONLY

C1



**U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION**

Consolidated Permit Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F	I	N	D	0	0	6	4	1	9	2	1	2		
---	---	---	---	---	---	---	---	---	---	---	---	---	--	--

OFFICIAL USE ONLY

APPROVED: DATE RECEIVED: 12/10/68

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item 1 above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

1. EXISTING FACILITY (See instructions for definition of "existing" facility.
Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES.
PROVIDE THE DATE
(YR, MO., & DAY) OPERA-
TION BEGAN OR IS
EXPECTED TO BEGIN

2	yr.	mo.	day	FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)
8	8	6	04	

B. REVISED APPLICATION (place an "X" below and complete item 1 above)

☐ I. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2: UNIT OF MEASURE – For each amount entered in column 8(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Storage:</u>			<u>Treatment:</u>		
CONTAINER (barrel, drum, etc.)	261	GALLONS OR LITERS	TANK	701	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	202	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	702	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	204	GALLONS OR LITERS	INCINERATOR	703	TONS PER HOUR OR METRIC TONS PER HOUR
<u>Disposal:</u>			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS		704	GALLONS PER DAY OR LITERS PER DAY
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	H
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	S
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	M		

EXAMPLE FOR COMPLETING IT W III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

DUP									
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5	S 0 2	30,000	G	
X-2	T 0 3	20	E		6	S 0 2	30,000	G	
1	S 0 2	150,000	G		7	S 0 2	30,000	G	
2	S 0 2	30,000	G		8				
3	S 0 2	30,000	G		9				
4	S 0 2	30,000	G		10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTER INCLUDE DESIGN CAPACITY.

T04: WASTES ARE RECEIVED AT FUEL UNLOADING AREA (SEE PAGES 5A AND 5B). AFTER PRELIMINARY ANALYSIS AND SCREENING, CONTENT OF TANKER IS PUMPED TO ONE OF SIX RECEIVING TANKS (30,000 GALLON CAPACITY EACH). TO INSURE UNIFORMITY OF BTU VALUE AND CHEMISTRY FOR CEMENT RAW MIX, CONTENT OF RECEIVING TANKS IS TRANSFERRED AS NEEDED TO THE FEED TANK. THIS FEED TANK (150,000 GALLON CAPACITY) SUPPLIES SUPPLEMENTAL FUEL TO FIRE THE ROTARY KILN.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "CCC" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE J-Z	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				Included with above

FOS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Petrochem Services Inc. (Heritage Environmental Svcs.)U.S. EPA I.D. No.: [REDACTED] (0311620007)Street: 1 Stephen Street (Canal Bank Rd. Northeast)City: Lemont ^{P.O. Box 337} State: IL Zip Code: 60639Telephone: (312) 739-1150Operator: Petrochem Services Inc. (Heritage Environmental Svcs.)Street: 1 Stephen St. (Canal Bank Rd. Northeast)City: Lemont State: IL Zip Code: 60639Telephone: (312) 739-1150Owner: Metropolitan Sanitary District of Greater ChicagoStreet: 100 East Erie StreetCity: Chicago State: IL Zip Code: 60611Telephone: (312) 675-2099Inspection [REDACTED] Time: 9:30 - 2:00p Weather Conditions: 35° DRY

	Name	Affiliation	Telephone
Inspectors:	Carol A. Groszer	IEPA	(312) 345-9780
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Facility Representatives:

Paul Zajec (312) 739-1150

	RCRA Status	E-Solvent	LDR Status California List	First Third
Generator	<u>X</u>	<u>X</u>		<u>X</u>
Transporter				
Treater	<u>X</u>	<u>X</u>		
Storer	<u>X</u>	<u>X</u>		<u>X</u>
Disposer				

INSPECTION SUMMARY

APPARENT LAND BAN VIOLATIONS

- Storage facility is not maintaining a copy of all land disposal restriction notifications from generators in their operating record.
- Treatment facility is not maintaining a copy of all land disposal restriction notifications from generators in their operating record.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	<u>X</u>	<u>X</u>	<u>X</u>	_____	_____
3.	F003	<u>X</u>	<u>X</u>	<u>X</u>	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	<u>X</u>	<u>X</u>	<u>X</u>	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.


B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.



N/A

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

N/A



	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	X	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	X	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	X	_____	_____
U036	_____	_____	X	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	X	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	X	_____	X	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	X	_____	_____
U122	_____	_____	X	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	X	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	X	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	X	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- N/A
- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>All first 3rd wastes stored + generated</u>		
<u>by facility is non-wastewater</u>		
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

F003, F005

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Every shipment coming in or going out is analyzed

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: U061

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

____ Yes ☒ No ____ NA

- Total Constituent Analysis

____ Yes ☒ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ☒ No ____ NA

- d. How does the generator test the waste when a process or waste stream changes?

On site lab

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ NoApplicable treatment standards ☒ Yes ☐ NoManifest number ☒ Yes ☐ NoWaste analysis data, if available ☒ Yes ☐ NoIdentify off-site treatment or storage facilities: Systemic hd,
Continental Cement - me

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ NoNO OFF
SITE
DISPOSAL

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ NoApplicable treatment standards ☐ Yes ☐ NoManifest number ☐ Yes ☐ NoWaste analysis data, if available ☐ Yes ☐ NoCertification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	_____ Yes	_____ No
The corresponding treatment standards and all applicable prohibitions	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Date the waste is subject to the prohibitions	_____ Yes	_____ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes _____ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

_____ Yes _____ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

_____ Yes _____ No

Addresses

_____ Yes _____ No

Telephone Numbers

_____ Yes _____ No

Contact dates

_____ Yes _____ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

_____ Yes _____ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☒ NA
 o First Third ☒ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? 11-2-88

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Generator required to provide analysis - Waste finger printed prior to acceptance on-site

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☒ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: Each shipment received from off site are finger printed to ensure waste is same as on manifest

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☐ Yes ☒ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

___ Yes ☒ No ___ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

___ Yes ___ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes ___ No ___ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes ___ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes ___ No ___ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

☒ Yes ___ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

Heat treatment using either internal steam coils or by circulation to facilitate separation of oils and waters

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

☒ Yes ☐ No

4. Is dilution used as a substitute for treatment?

☐ Yes ☒ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

☐ Yes ☒ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No ☐ NA

NO
OFF SITE
DISPOSAL

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report		
							88	87	86
S01	Yes	No	Yes	No	Yes	No	Y	Y	Y
S02	Yes	No	Yes	No	Yes	No	N	Y	Y
S03	Yes	No	No	No	No	No	N	N	N
T01	Yes	No	Yes	No	Yes	No	Y	Y	Y
T04	Yes	No	Yes	No	No	No	Y	Y	N
	...			:					

Operator: Heritage Environmental Services Inc. Telephone #: (312) 739-115

Street: One Stephen Street (NE Canal Bank Road)

City: Lemont State: IL Zip Code: 60439

Owner: Water Reclamation District of Greater Chicago Telephone #: (312) 675-8005

Street: 100 East Erie Street

City: Chicago State: IL Zip Code: 60611

Person Interviewed	Title	Telephone #
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Paul Zajac Plant Foreman (312) 739-115

Inspection Participants

Agency/Title

Telephone #

Carol Grasser IEPA / EPS (312) 345-9770

RON BROWN USEPA/RCRA ENFORC. BRANCH (312) 886-4463

Jim Finn USEPA/SAFETY MGR REGION 7 (312) 353-2075

Prepared by

Agency/Title

Telefona :

Carol Grasser IEPA/EP5 (312) 345-9780

Summary of Apparent Violations

Area	Class	Section
OTH	II	725.115a
OTH	II	725.115b
OTH	I	725.135
OTH	II	725.274
OTH	I	726.134c

[illegible][illegible]

Facility Name: Heritage Environmental Services Inc. USEPA #: IL0085349264 IEPA #: 0311620007

HAZARDOUS WASTE

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700 -12 *	On 3610 -3 *	On Annual Rpt. for 87 87 86 * * *			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Hazardous Waste Fuel	Secondary Fuel Blending	9-15-89	D001 F003 F005	Y	Y	Y	Y	Y	44,016 gal	500,000 GALS PER YEAR	9-15-89	BURNED IN A CEMENT KILN IN INDIANA: SYSTEC
Hazardous Waste Fuel	Secondary Fuel Blending	6-21-89	D001 F003 F005	Y	Y	Y	Y	Y	SAME AS ABOVE	SAME AS ABOVE	6-21-89	BURNED IN A CEMENT KILN IN MISSOURI: CONTINENTAL CENTRE
LOW FLASH TREATMENT WATER	WASTE WATER FROM TREATMENT OF HAZARDOUS WASTE	9-7-89	D001	Y	Y	Y	Y	Y	14,355 gal	15-20,000 GALS PER YEAR	9-7-89	HERITAGE IN INDIANA FOR DEWATERING
USED OIL AND OIL/WATER MIXTURES	BROUGHT FROM OFF-SITE UNABLE TO TREAT ON-SITE	9-7-89	D008	Y	Y	Y	Y	Y	14,454 gal	60,000 GALS PER YEAR	9-7-89	SENT TO HES IN INDIANA FOR TREATMENT
TOX-AWAY WASTES	HOUSEHOLD HAZ. WASTE COLLECTION IN INDIANAPOLIS LAB-PACKED	TEMP. STORAGE LAB-PACK	VARIES	Y	Y	Y	Y	Y	NONE	NO WINGER GENERATED	2-20-89	→
WASTE PETROLEUM NAPHA	PARTS CLEANER IN GARAGE		D001	Y	Y	Y	Y	Y		30 GALS MONTHLY	8-30-89	SAFETY KLEEN FOR RECLAMATION
WASTE FLAMMABLE SOLIDS	SPILL PADS FROM CLEANUPS FROM ERU AND IN SUPPL. FUEL PROD.	8-7-89	F003 D008	Y	Y	Y	Y	Y	209 drums	VARIES	8-7-89	CWM IN CHICAGO FOR INCINERATION
FLAMMABLE SOLIDS	STRAINER CLEANINGS IN SECONDARY FUEL BLENDING PROCESS	7-23-89	F002 F003 F005	Y	Y	Y	Y	Y	same as above	25-50 ss gal drums yearly	7-23-89	INCINERATED AT ROLLINS ENVIRONMENTAL IN LOUISIANA
FLAMMABLE SOLIDS	SAME AS ABOVE	6-5-89	F002 F003 F005	Y	Y	Y	Y	Y	same as above	SAME AS ABOVE	6-5-89	INCINERATED AT ROSS IN OHIO

* All "N" responses must be explained in the narrative.

OCT 04 1989

NARRATIVE

IEPA-DLPC

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. HES consists of two divisions. The first, Remediation Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES temporarily stores waste for DEA and formerly stored waste for IEPA ERU/DCI activities. Temporary storage of household hazardous waste collected in a program in Indianapolis, Indiana, has been discontinued.

The second division is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance PCB screening is performed while the waste is kept in any one of the storage tanks. Gravity separation occurs in Cone Bottom tanks. Solids collected in the bottom of the tanks are removed, and separated water is stored until it can be shipped to HES in Indiana. Non-separated oil water mixtures are then treated with heat in order to facilitate separation. The oil resulting from this process is hazardous waste fuel which is sold to cement kilns. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production.

HAZARDOUS WASTES GENERATED

Note #1 - Wastes going off-site for further treatment, incineration or reclamation are analyzed on the day of transport.

Hazardous Waste Fuel - D001, F003, F005. Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burned in cement kilns. At the time of the inspection the fuel was being sold exclusively to Systec in Indiana. The last shipment was 9/15/89. The last shipment to Continental Cement in Missouri was 6/21/89. Approximately 500,000 gallons are generated yearly. There were 46,016 gallons on site.

Low Flash Water - D001. Waste water separated from hazardous waste. This waste was formerly sent to Century Resources for de-watering and is now sent to HES in Indiana. The last shipment was 9/7/89. Approximately 15,000-20,000 gallons are generated annually. There were 14,355 gallons on site.

Used Oil and Oil/Water Mixtures - D008. Waste brought on-site from off-site that the facility was unable to treat. The last manifested shipment was on 9/7/89 and went to HES in Indiana. There were 14,454 gallons on site.

Waste Flammable Solids - F003, D008. Spill pads from emergency cleanups and solids from supplemental fuel production. The rate of generation varies. The last manifested shipment was 8/7/89 and went to CWM in Chicago for incineration. There were 209 drums on site.

Flammable Solids - F002, F003, F005. Generated during strainer cleaning in the secondary fuel blending process. 25-50 drums are generated yearly. The waste was formerly sent to ROSS Incinerator in Ohio with the last shipment being 6/5/89. Presently HES is using Rollins Environmental incinerator in Louisiana. The last manifested shipment was 7/23/89. The amount on site is included with the above waste stream.

Waste Petroleum Naphtha - D001. Generated in a parts cleaner in the maintenance garage, 30 gallons are generated monthly. The last manifested shipment was 8/30/89 and went to Safety Kleen for reclamation.

NON-HAZARDOUS WASTE GENERATED

Crushed Drums - RCRA empty 55 gallon drums. Six loads are generated yearly. The last manifested shipment was 7/20/89 and was sent to CID #2 for landfilling. There was less than one load on site.

Solids - Non-hazardous tank bottoms and soil from remediation activities. The rate of generation varies. The last manifested shipment was landfilled at CID #2 on 8/18/89. There weren't any solids on site.

Waste Oil - Non-hazardous loads that were not gravity separated. Approximately 75,000 gallons are generated per year. The last manifested shipment was 8/14/89 and went to HES in Indianapolis for treatment. There were ten drums on site.

Treatment Water - Rain water and water separated from non-hazardous oil streams. Approximately 100,000 gallons are generated yearly. The last manifested shipment was 9/7/89 and went to HES in Indiana for treatment. There 16,389 gallons on site.

HAZARDOUS WASTE UNITS

S01 - Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete pad. The trailers are used primarily for temporary storage of DEA wastes. DEA acts as the generator when the waste is sent off-site for incineration.

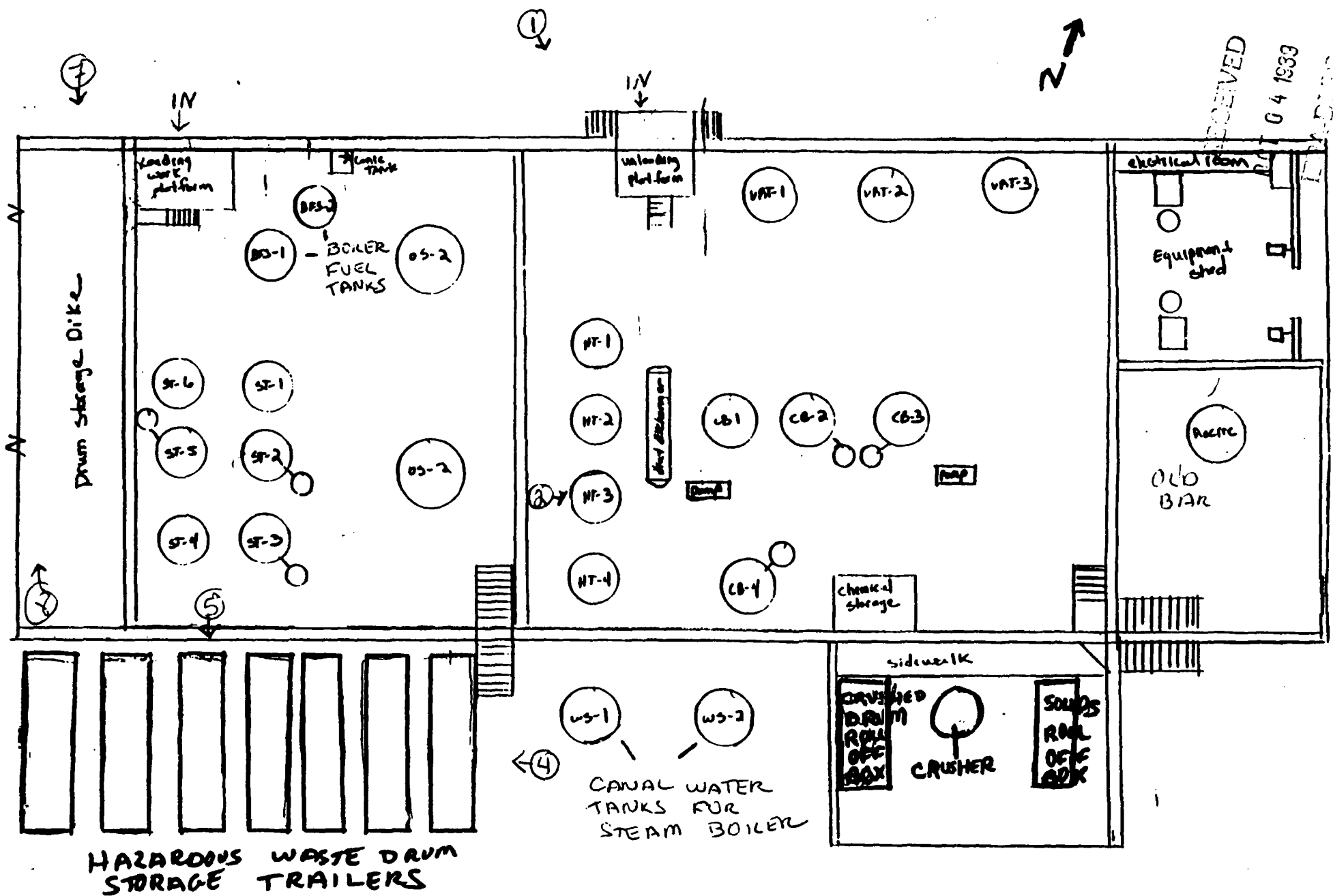
- S02 - Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through ST 6 tanks.
- T01 - Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.
- T04 - Treatment in containers. Treatment in containers is not occurring at this time.

NOTE #2 - Aisle space was not provided for the drums in one of the trailers. According to Paul Zajec, inspections are not conducted of the inside of the storage trailers. HES considers the trailer itself a container therefore only the outside of the trailer is inspected for leaks. Wet oil dry was observed inside the trailer. According to Mr. Zajec the wet spot was probably due to rain entering the trailer through leakage.

APPARENT VIOLATIONS

- 725.115a - The inside of the container storage trailers are not being inspected.
- 725.115b - The container storage trailers are not included in the inspection schedule.
- 725.135 - Inadequate aisle space inside a container storage trailer.
- 725.274 - Containers in the trailers are not inspected weekly.
- 726.134c - Marketer of hazardous waste fuel is out of compliance with 725 subparts B, C and I.

CAG:bh:4259B



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	<input checked="" type="checkbox"/>			RECEIVED OCT 04 1989 IEPA-DLPC
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.151: Application by New HWM Facilities</p> <p>For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced?</p> <p>Yes ____ No ____</p> <p>Is the facility only operating with a RCRA permit?</p> <p>Yes ____ No ____</p> <p>NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.</p>			X	NOT A NEW FACILITY
OTH	1			<p>Section 703.152: Amended Part A Application</p> <p>Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:</p> <p>1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling?</p> <p>Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status?</p> <p>Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>	X			

PER-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1			Section 703.155: Changes During Interim Status <u>NOTE:</u> Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

PER-C-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest				
				Section 722.120: General Requirements	X			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>				NO SUCH INSTANCES IN THE LAST 6 MONTHS

GEN-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: <ol style="list-style-type: none"> Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			


GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>NO BULK SHIPMENTS BY RAIL OR WATER</p>

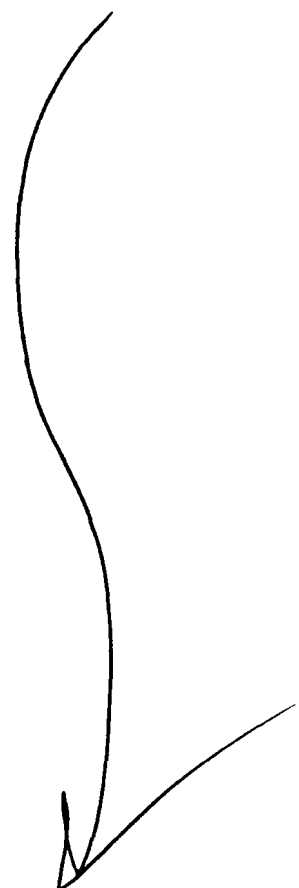
GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				
OTH	1	X		Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?	X			
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?	X			
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	X			
				b Is each package of hazardous waste which is ready for transportation off-site marked with: <ul style="list-style-type: none"> - The generator's name and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The manifest document number associated with the container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			X	TRANSPORTER PROVIDES PLACARDS
OTH	1	X		Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.			X	WASTE IS NOT ACCUMULATED AS IT IS ALL IN THE PERMITTED STORAGE AREA 

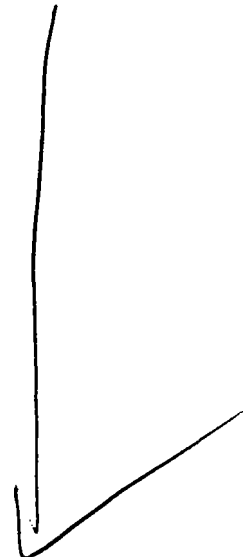
GEN-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes _____ No _____ N/A _____ - Complying with the requirements of: <ul style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes _____ No _____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes _____ No _____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes _____ No _____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes _____ No _____ 				<p>NO SATELLITE ACCUMULATION</p> 

GEN-C-26

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	2				Section 722.141: Annual Reporting				
					Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
					<u>NOTE:</u> A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1				Section 722.142: Exception Reporting				
			a		Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b		Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b		Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

X NO EXCEPTION REPORTS NEEDED



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p> <p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				<p>NONE REQUIRED</p>
							X	

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste</p> <p>Section 722.152: General Requirements</p> <p>Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No _____</p> <p>NOTE: If "No", skip Subpart E. If "Yes", answer the next question.</p> <p>Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____</p> <p>NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.</p>			X	NO EXPORTS

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			X	NO IMPORTS
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;				
				and				
			b2	Has the importer or his agent signed the manifest in place of the generator;				
				and				
	b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____						
	c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____						

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <input checked="" type="checkbox"/> NOTE: If "Yes", explain in narrative.	<input checked="" type="checkbox"/>			
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No <input checked="" type="checkbox"/>				

TSD-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	<input checked="" type="checkbox"/>			NO WASTE RECEIVED FROM FOREIGN SOURCE
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes <input checked="" type="checkbox"/> No ___ N/A ___				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No ___	<input checked="" type="checkbox"/>			

TSD-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				
OTH	1	X			<input checked="" type="checkbox"/>			

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - <u>725.274 (Containers);</u> - <u>725.294 (Tanks);</u> - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No ____</p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No ____</p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No ____ - The name of the inspector? Yes <input checked="" type="checkbox"/> No ____ 				<p>CONTAINERS STORED IN TRAILERS ARE NOT INSPECTED</p>

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	2			<p>- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				NOT AN LDF

TSD-B-9

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	<input checked="" type="checkbox"/>			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			a	<p>Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			b	<p>Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:</p> <ol style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			X	NO SUCH LAND FORMS

TSD-B-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?		<input checked="" type="checkbox"/>		
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

NO
REFUSALS

TSD-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan	<input checked="" type="checkbox"/>			
			a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
OTH	2			Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				<p>Lemont Police & Fire</p> <p>Silver Cross Hosp.</p> <p>Palos Community Hosp.</p>

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			Verbal signal or short continuous blast on alarm
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.153: Copies of Contingency Plan				
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-D-3

Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CPG*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental

Services

Comments: HEC CREW

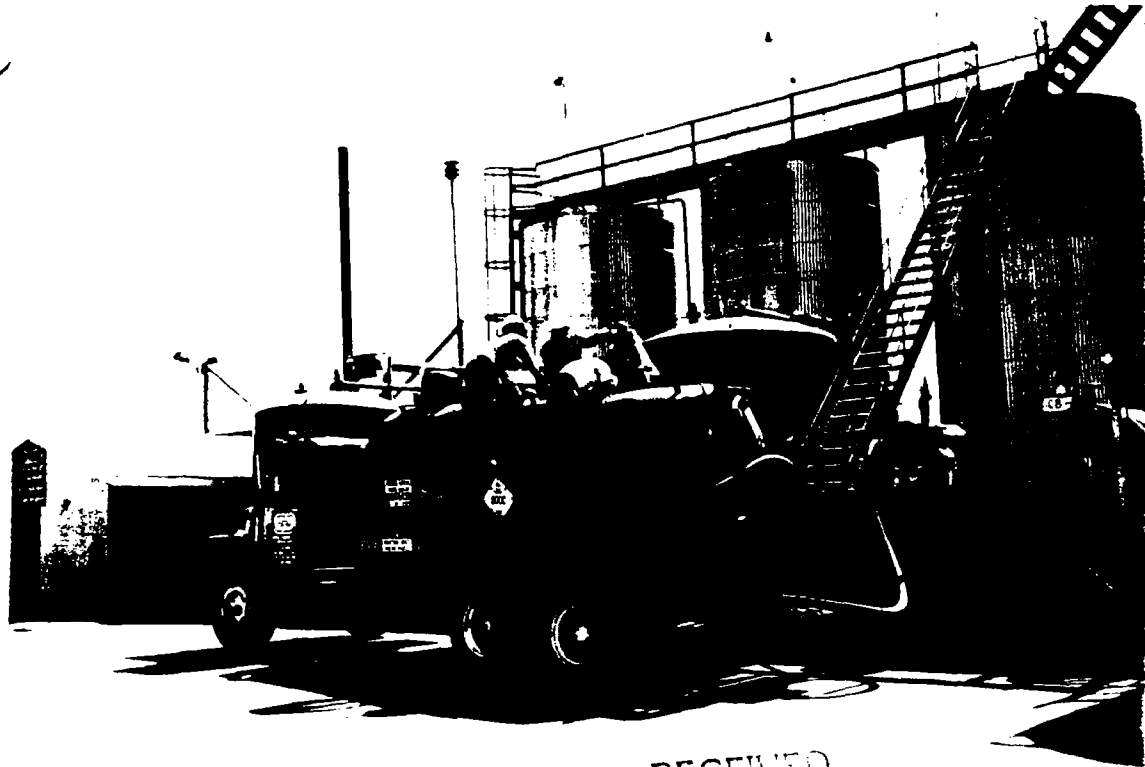
PUMPING WATER

FROM TANK

DIKE

Photo # 1 Roll # 90-86

↑
SE



RECEIVED
SEP 15 1989
EPA/DOE

Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CPG*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental

Services

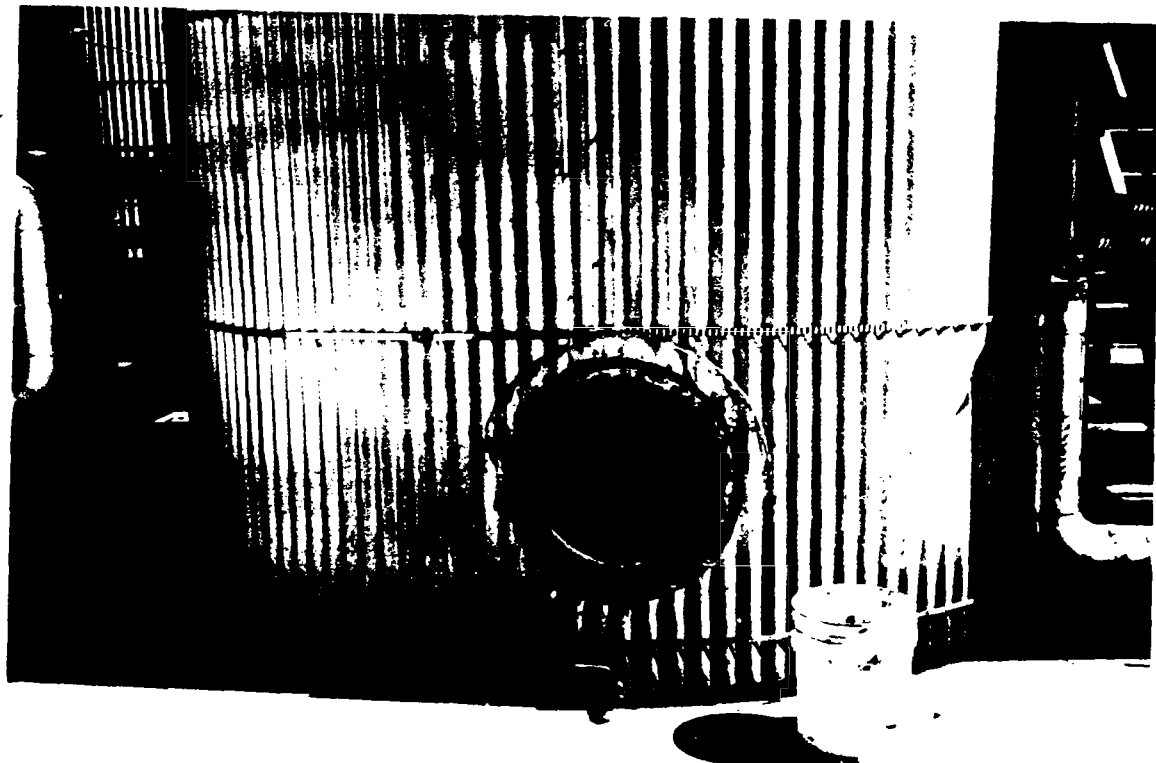
Comments: TANK

CLEANING

HT-3

Photo # 2 Roll # 90-89

↑
E



Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CAG*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental

Services

Comments: TANK

STORAGE AREA

Photo # 3 Roll # 90-86

↑
N



Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CAG*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental

Services

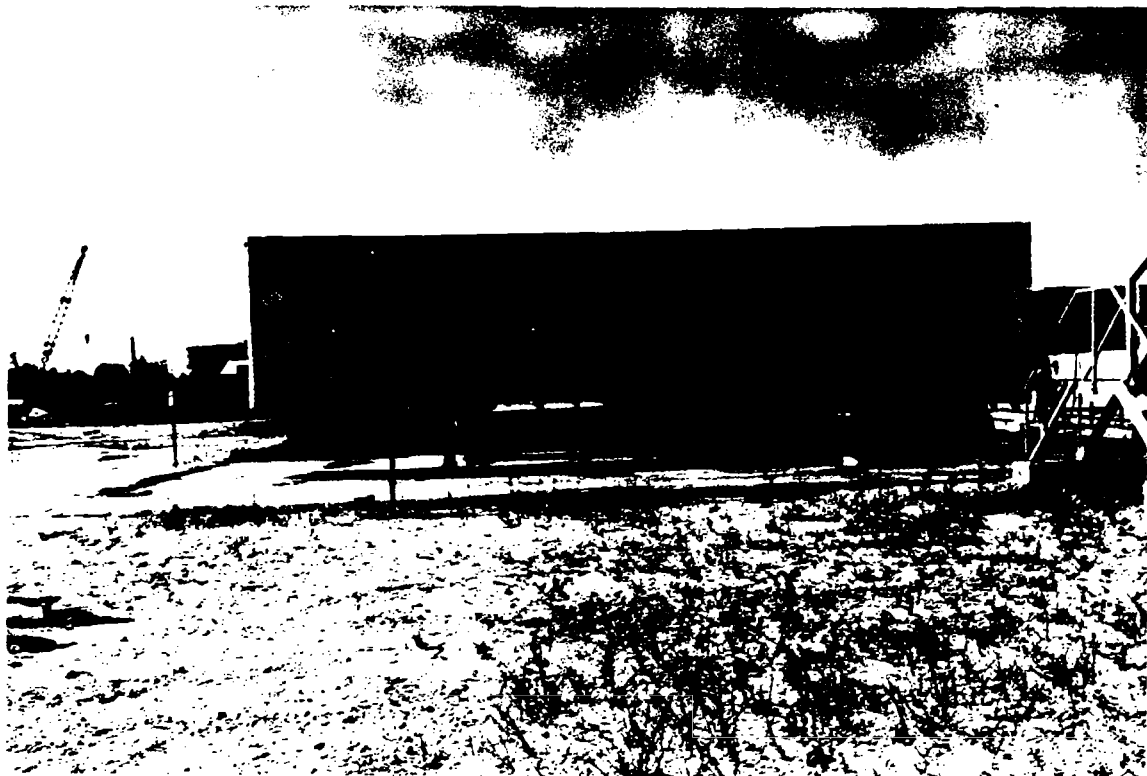
Comments: CONTAINER

STORAGE UNIT

1 IDE TRAILERS

Photo # 4 Roll # 90-89

↑
W



Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CRG*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental
Services

Comments: INSIDE OF

TRAILER

Photo # 5 Roll # 90-86

S ↑

Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CRG*

City: Lemont

EPA #: 0311620007

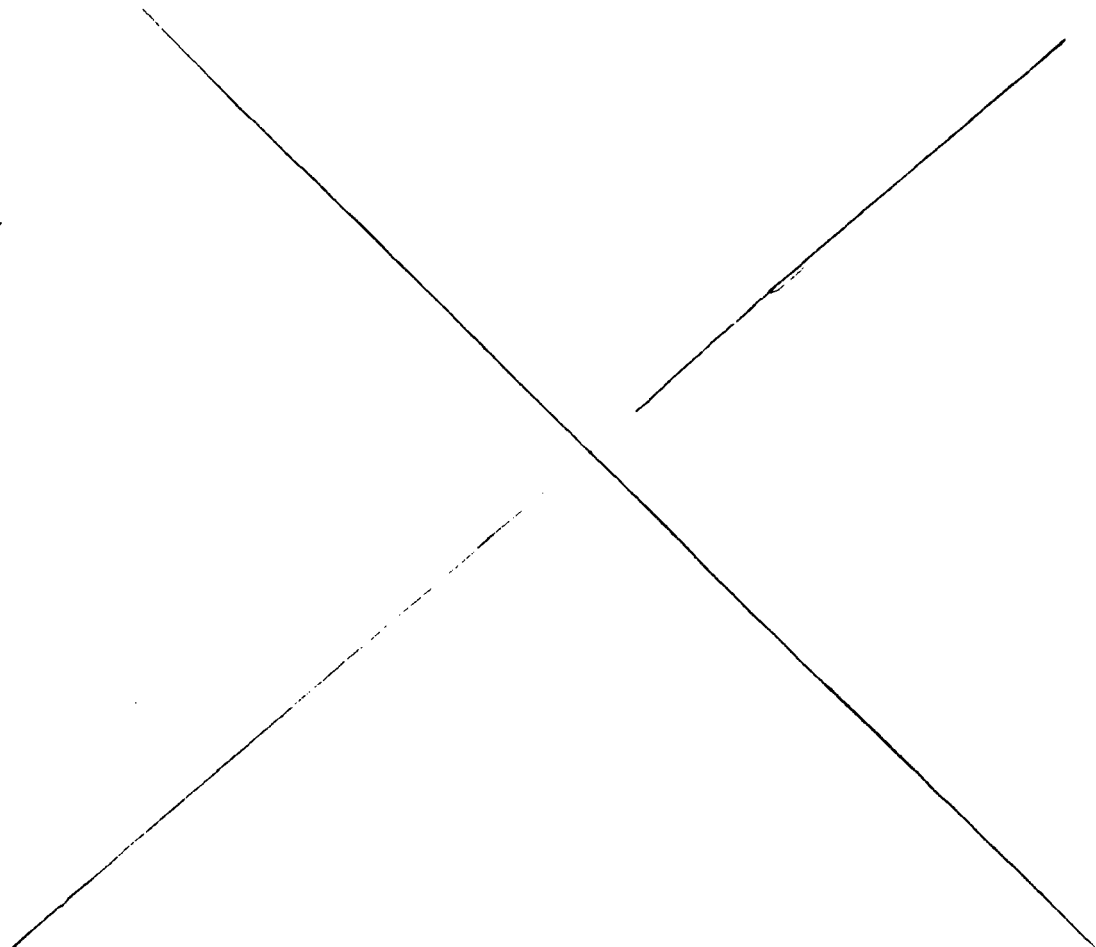
Site Name:

Heritage Environmental
Services

Comments: DID NOT

TURN OUT

Photo # 6 Roll # 90-89



Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CPS*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental

Services

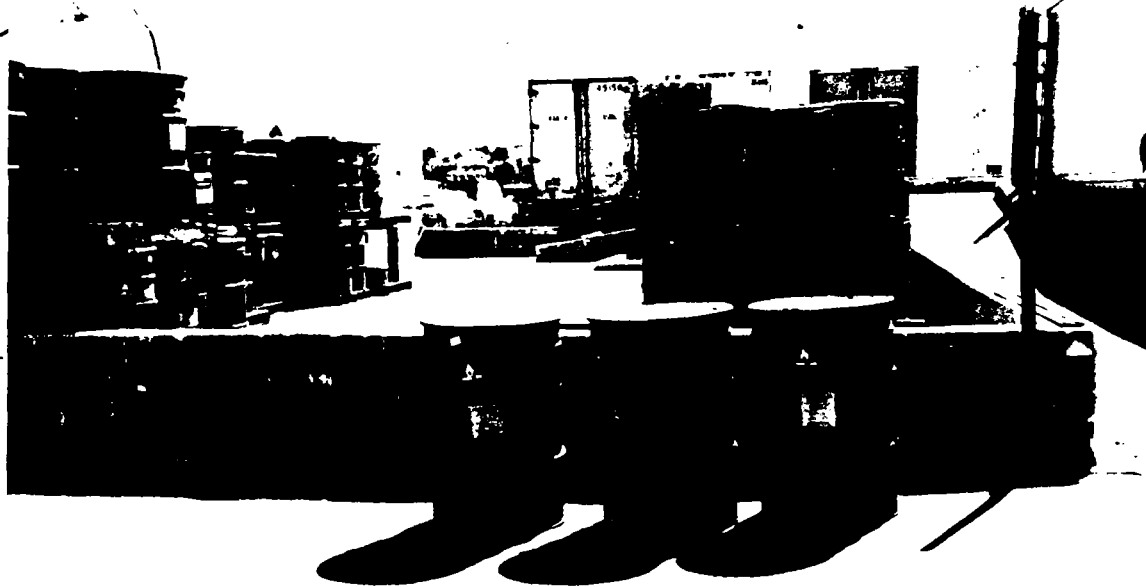
Comments: CONTAINER

STORAGE UNIT.

TANK CLEANING

PRIOR TO PUNCHMENT
TO STORAGE AREA

Photo # 7 Roll # 90-86



S ↑

Date: September 15, 1989

Time: 9:45am-1:30pm

Photograph By:

Carol A. Graszer *CPS*

City: Lemont

EPA #: 0311620007

Site Name:

Heritage Environmental

Services

Comments: LOAD

READY FOR

TRANSPORT

Photo # 8 Roll # 90-89



*↑
N*

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			<p>9-1-88 SHREDDER UNIT FIRE. SEE INSPECTION REPORT FROM 3-89 FOR DETAILS</p>

TSD-D-5


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-E-1

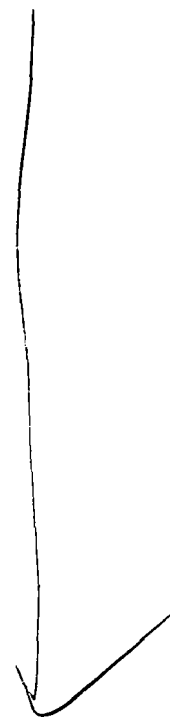
Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
			a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Does the operating record contain the following information:				
				1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

NOT AN L.O.F.

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				<p>NONE OR THESE UNITS</p> 

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				<p>NOT AN L.D.F.</p> 

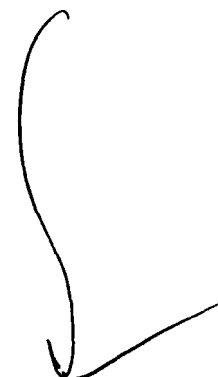
TSD-E-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			NOT AN L.O.R.
			12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>					
				Section 725.174: Availability, Retention and Disposition of Records				
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/> - The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 				NOT AN L.O.R.
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				NOT REQUIRED


TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	X			
OTH	1			Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes <u>X</u> No <u> </u> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <u> </u> No <u>X</u> Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <u> </u> No <u>NA</u> X NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <u> </u> No <u> </u>	X			


WASTE NOT
ACCEPTED WITHOUT
MANIFEST



TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____</p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>				 NOT AN L.D.P. NO CLOSURE
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

TSD-E-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
CLO	1				<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____ - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____ <p>Section 725.218: Post-Closure Plan</p> <p>a Was the most current facility post-closure plan available during the inspection? Yes ____ No ____</p> <p>Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____</p>				 <p>NOT AN L.D.F.</p>
FIN	1				<p>Section 725.242: Cost Estimate for Closure</p> <p>Has the facility prepared a written estimate of the cost of closing the facility?</p>				
FIN	1				<p>Section 725.244: Cost Estimate for Post-Closure Care</p> <p>Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?</p> <p><u>NOTE:</u> If no post-closure plan, mark "N/A".</p>				

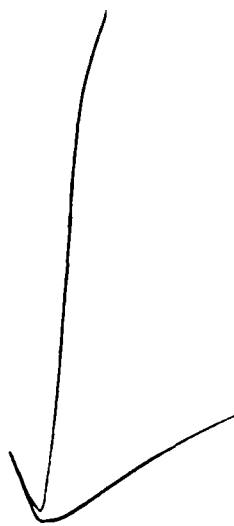
TSD-G/H-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	X			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	X			



TSD-I-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems</p> <p>Section 725.290: Applicability</p> <p>Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p>NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>NOTE: Failing the filter test means that the waste contains free liquids.</p>				
			a	<p>Section 725.291: Assessment of Existing Tank Systems</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>			X	<p>TANKS ARE PROTECTED BY SECONDARY CONTAINMENT ALTHOUGH ASSESSMENT IS AVAILABLE (MAY 20 + 21, 1987)</p>

TSD-J-1

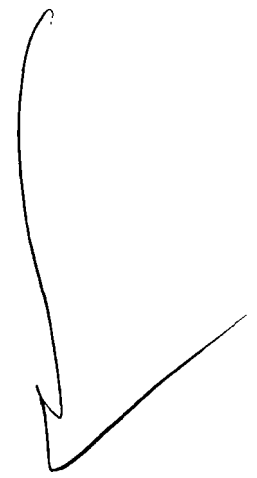
Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				<p>TANKS AT LEAST 6 YEARS OLD</p> 
			a	<p>Section 725.292: Design and Installation of New Tank Systems or Components</p> <p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>				

TSD-J-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ____ No ____				 NO NEW TANKS THESE WASTES ARE NOT STORED SECONDARY CONTAINMENT PROVIDED FOR ALL WASTE 
				Section 725.293: Containment and Detection of Releases				
	a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ____ No ____ N/A <input checked="" type="checkbox"/>						
	a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>						
	a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input checked="" type="checkbox"/> No ____ N/A ____						
	a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes <input checked="" type="checkbox"/> No ____ N/A ____						
			or					
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes <input checked="" type="checkbox"/> No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) <u>a vault; or</u> 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				All tanks are above ground 


TSD-J-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements	<input checked="" type="checkbox"/>			
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
OTH	2		c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.295: Inspections	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems			<input checked="" type="checkbox"/>	NO UNCOVERED TANKS
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				NO APPARENT LEAKS OR SPILLS ↓

TSD-J-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ____ No ____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____</p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p>				

TSD-J-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.		
			Sub Sec		Yes	No				
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p>				 <p>NO CLOSURE</p>		
				Section 725.297: Closure and Post Closure Care						
				<p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>						
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>						
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>						
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p>						
				<p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>						

TSD-J-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>			<input checked="" type="checkbox"/>	INCOMPATIBLES NOT TREATED OR STORED IN THE SAME TANK SYSTEM

TSD-J-9

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
OTH		X			Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	X			
	I		a		Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH					Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel			X	FACILITY IS NOT THE TRANSPORTER
	I				Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
OTH		X			Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel		X		
OTH	II		a		Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> and				SYSTEC - INDIANA CONTINENTAL CEMENT - IN

726-D-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	I		c	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>				
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				It is burned in a cement kiln in apparent compliance with 726.131(c).
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				

726-D-2

Name of Facility: Petrochem Services Inc. (Herzog Environmental Services Inc.)
I.D. Number: 140085349264 (0211620007)
Location: 1 Stephen Street (Canal Bank Rd. N.E.)
Lemont IL 60439
Date of Inspection: 9-15-89
Inspector: Carol Grasz
Telephone Number: (312) 345-9780

☒ Interim Status ☐ RCRA Permit
☐ Treatment ☒ Storage ☐ Disposal
☐ Land Disposal Facility

Are there any known releases? Yes No X

Does the unit receiving CERCLA waste meet the double liner requirements? Yes X No

Any Class I violations? Yes X No

If yes, identify type briefly: INSUFFICIENT AISLE SPACE IN CONTAINER
STORAGE TRAILER - 725.135

Schedule for next inspection: MARCH 1990

FOLD ON LINE

United States
Environmental Protection Agency
230 South Dearborn
Chicago, Illinois 60604

Official Business
Penalty for Private Use \$300



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO 11663 WASHINGTON DC

POSTAGE WILL BE PAID BY ENVIRONMENTAL PROTECTION AGENCY

**United States
Environmental Protection Agency
Waste Management Division
230 South Dearborn Street
Chicago, Illinois 60604**

ATTN: Gertrud Matuschkovitz, 5HE-12



FOLD ON LINE

HERITAGE

Attn: Carol A. Graszer
Environmental Protection Specialist
Field Operations Section
Division of Land Pollution Control

1701 South First Avenue
Suite 600
Maywood, IL 60153

List of tank volumes at Heritage Environmental Services, Lemont,
IL.

TANK VOLUMES

SUPPLEMENTAL FUEL	46,016 Gal.
OIL & WATER	14,454 Gal.
TREATMENT WATER	16,389 Gal.
LOW FLASH LIQUID	14,355 Gal.

If you have any questions, please call Paul A. Zajec at 739-1150.

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439
Telephone 312/739-1150



HERITAGE REMEDIATION/ENGINEERING, INC.

P.O. Box 337
Lemont, IL 60439

Phone 312/739-1150
Fax 312/739-9491

DOCUMENT TRANSMISSION COVER PAGE

DATE: 9/21/89

TIME: 2:10 PM

SENDER: NAME Paul A. Zajec
COMPANY Heritage Environmental Services
OUR FAX NUMBER IS: (312) 739-9491

RECEIVER: NAME CAROL A. GRASZER
COMPANY EPA
FAX NUMBER _____

NUMBER OF PAGES (INCLUDING THIS PAGE) 4

COMMENTS: _____

(IF TRANSMISSION IS NOT COMPLETE, PLEASE CALL ME AT (312) 739-1150.)

HERITAGE REMEDIATION/ENGINEERING, INC.



Attn: Carol A. Graszner
Environmental Protection Specialist
Field Operations Section
Division of Land Pollution Control

1701 South First Avenue
Suite 600
Maywood, IL 60153

List of generators and hazardous waste stored in trailers at
Heritage Environmental Services, Lemont, IL.

<u>GENERATOR</u>	<u>WASTE</u>	<u>HAZ. CODE</u>
DEA	ISOPROPYL ALCOHOL	D001
DEA	HAZARDOUS WASTE LIQUID	D002
DEA	BENZALDEYNE	D001
DEA	ACETONE	D001
DEA	RED PHOSPHORUS	D001
DEA	FREON-CARBON TETRACHLORIDE	U211
DEA	METHAMPHETAMINE & ACETONE SOAKED OIL DRY	D001
DEA	SODIUM HYDROXIDE	D002
DEA	PHENYL ACETIC ACID	D002
DEA	PYRIDINE	U179
DEA	ALKALINE LIQ. (LYE & WATER)	D002
DEA	MURATIC ACID	D002
DEA	HYDROCHLORIC ACID	D002
DEA	TRICHLOROFLUOROMETHANE	F002
DEA	ACETIC ANHYDRIDE	D002
MISSOURI DNR	WASTE FLAMMABLE LIQUIDS	D001
MISSOURI DNR	HAZ. WASTE LIQUIDS	D005
MISSOURI DNR	ACIDS	D002
HERITAGE	TOLUENE (LAB USE)	D001
HERITAGE	FLAMMABLE SOLIDS	F001, F003, F005
HERITAGE	FLAMMABLE LIQUIDS	D001
HERITAGE	CHLOROFORM	U044

If you have any questions, please call Paul A. Zajec at 739-1150.

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439
Telephone 312/739-1150



Attn: Carol A. Graszer
Environmental Protection Specialist
Field Operations Section
Division of Land Pollution Control

1701 South First Avenue
Suite 600
Maywood, IL 60153

List of drum inventory at Heritage Environmental Services,
Lemont, IL

DRUM INVENTORY

ACID	2 DRUMS
FLAMMABLE SOLIDS	209 DRUMS
FLAMMABLE LIQUIDS	34 DRUMS
NON-HAZARDOUS OILS	10 DRUMS

If you have any questions, please call Paul A. Zajec at 739-1150.

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439
Telephone 312/739-1150

0007

HERITAGE REM/ENG

8312 739 9491

09/21/89 13:44

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Petrochem Services Inc. (Heritage Environmental Services)

U.S. EPA I.D. No.: [REDACTED] (031162007)

Street: 1 Stephen Street (Canal Bank Rd. Northeast)

City: Lemont State: IL Zip Code: 60639

Telephone: (312) 739-1150

Operator: Petrochem Services Inc. (Heritage Environmental Services)

Street: 1 Stephen Street (Canal Bank Rd. Northeast)

City: Lemont State: IL Zip Code: 60639

Telephone: (312) 739-1150

Owner: Water Reclamation District of Greater Chicago

Street: 100 East Erie Street

City: Chicago State: IL Zip Code: 60611

Telephone: (312) 675-7099

Inspection Date: [REDACTED] Time: 9:45a - 1:30p Weather Conditions: 65° CLEAR

	Name	Affiliation	Telephone
Inspectors:	<u>Carol Grazer</u>	<u>IEPA</u>	<u>(312) 345-9780</u>
	<u>RON BROWN</u>	<u>USEPA</u>	<u>(312) 886-4463</u>
	<u>Jim Finn</u>	<u>USEPA</u>	<u>(312) 353-2045</u>

Facility Representatives: Paul Zajec (312) 739-1150

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
Transporter	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Treater	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
Storer	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
Disposer	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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Revised 9-26-88

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☒ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

NO
PCBS



3. **First Third Wastes:** Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>U129, U036,</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>U051, U188,</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>U122, P037,</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>U036, U061,</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>P018, U129,</u>		<input checked="" type="checkbox"/>
<u>P123, P001,</u>		<input checked="" type="checkbox"/>

B. Waste Analysis

1. **F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste *and analysis*

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

GEN

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: F001, F002, F003, F005

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Analysis conducted on each waste prior to shipment off-site.

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☒ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☒ No ☐ NA

What type of absorbent is used? None added

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☒ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing ☒ Yes ☐ No ☐ NA

If yes, list test method used: fingerprinted for pH

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☒ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

PFLT

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes ☐ No ☐ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes ☐ No ☐ Soft hammer

If yes, specify the waste stream: 5061

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☒ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test the waste when a process or waste stream changes?

Off site lab

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ NoApplicable treatment standards ☒ Yes ☐ NoManifest number ☒ Yes ☐ NoWaste analysis data, if available ☒ Yes ☐ NoIdentify off-site treatment or storage facilities: CWM, ROLLINS,
ROSS, IFS INDIANA, SYSTEC, CONT. GEMENT,

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

NA

f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ NoApplicable treatment standards ☐ Yes ☐ NoManifest number ☐ Yes ☐ NoWaste analysis data, if available ☐ Yes ☐ NoCertification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☒ No ☐ NA

NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☒ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted? ☒ Yes ☐ No

Addresses ☒ Yes ☐ No

Telephone Numbers ☒ Yes ☐ No

Contact dates ☒ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

NA

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

☒ Yes ☐ No

Describe the type of treatment and treatment facilities _____

INCINERATORS: ROSS, ROLLINS, CWM
HES INDIANA - TREATMENT CEMENT KILNS:
CONT. CEMENT
SYSTEM

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

☒ Yes ☐ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

☒ Yes ☐ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ☒ Yes ☐ No

(ii) Manifest number ☒ Yes ☐ No

(iii) Waste analysis data, if available ☒ Yes ☐ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

☒ Yes ☐ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
 o California List ☒ Yes ☐ No ☐ NA
 o First Third ☒ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? 11-8-88

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Provided by generator

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☒ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: Analysis provided by generator - bi-annually by HES

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☒ Yes ^{*} ☐ No

Apparent violation cited 3/89 corrected
by recent accomplishment of notification with
manifests

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

___ Yes ☒ No ___ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

___ Yes ___ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes ___ No ___ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes ___ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes ___ No ___ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

☒ Yes ___ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

Heat treatment

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

☒ Yes ☐ No

4. Is dilution used as a substitute for treatment?

☐ Yes ☒ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

☒ Yes ☐ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities:

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

___ Yes ☒ No ___ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

___ Yes ___ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

___ Yes ___ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

___ Yes ___ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

___ Yes ___ No ___ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

___ Yes ___ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

___ Yes ___ No

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____


5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

NO
LAND
DISPOSAL

- 
7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

NARRATIVE

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. HES consists of two divisions. The first, Remediation Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES temporarily stores waste for DEA and formerly stored waste for IEPA ERU/DCI activities. Temporary storage of household hazardous waste collected in a program in Indianapolis, Indiana, has been discontinued.

The second division is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance PCB screening is performed while the waste is kept in any one of the storage tanks. Gravity separation occurs in Cone Bottom tanks. Solids collected in the bottom of the tanks are removed, and separated water is stored until it can be shipped to HES in Indiana. Non-separated oil water mixtures are then treated with heat in order to facilitate separation. The oil resulting from this process is hazardous waste fuel which is sold to cement kilns. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production.

HAZARDOUS WASTES GENERATED

Note #1 - Wastes going off-site for further treatment, incineration or reclamation are analyzed on the day of transport.

Hazardous Waste Fuel - D001, F003, F005. Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burned in cement kilns. At the time of the inspection the fuel was being sold exclusively to Systec in Indiana. The last shipment was 9/15/89. The last shipment to Continental Cement in Missouri was 6/21/89. Approximately 500,000 gallons are generated yearly. There were 46,016 gallons on site.

Low Flash Water - D001. Waste water separated from hazardous waste. This waste was formerly sent to Century Resources for de-watering and is now sent to HES in Indiana. The last shipment was 9/7/89. Approximately 15,000-20,000 gallons are generated annually. There were 14,355 gallons on site.

Used Oil and Oil/Water Mixtures - D008. Waste brought on-site from off-site that the facility was unable to treat. The last manifested shipment was on 9/7/89 and went to HES in Indiana. There were 14,454 gallons on site.

Waste Flammable Solids - F003, D008. Spill pads from emergency cleanups and solids from supplemental fuel production. The rate of generation varies. The last manifested shipment was 8/7/89 and went to CWM in Chicago for incineration. There were 209 drums on site.

Flammable Solids - F002, F003, F005. Generated during strainer cleaning in the secondary fuel blending process. 25-50 drums are generated yearly. The waste was formerly sent to ROSS Incinerator in Ohio with the last shipment being 6/5/89. Presently HES is using Rollins Environmental incinerator in Louisiana. The last manifested shipment was 7/23/89. The amount on site is included with the above waste stream.

Waste Petroleum Naphtha - D001. Generated in a parts cleaner in the maintenance garage, 30 gallons are generated monthly. The last manifested shipment was 8/30/89 and went to Safety Kleen for reclamation.

NON-HAZARDOUS WASTE GENERATED

Crushed Drums - RCRA empty 55 gallon drums. Six loads are generated yearly. The last manifested shipment was 7/20/89 and was sent to CID #2 for landfilling. There was less than one load on site.

Solids - Non-hazardous tank bottoms and soil from remediation activities. The rate of generation varies. The last manifested shipment was landfilled at CID #2 on 8/18/89. There weren't any solids on site.

Waste Oil - Non-hazardous loads that were not gravity separated. Approximately 75,000 gallons are generated per year. The last manifested shipment was 8/14/89 and went to HES in Indianapolis for treatment. There were ten drums on site.

Treatment Water - Rain water and water separated from non-hazardous oil streams. Approximately 100,000 gallons are generated yearly. The last manifested shipment was 9/7/89 and went to HES in Indiana for treatment. There 16,389 gallons on site.

HAZARDOUS WASTE UNITS

S01 - Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete pad. The trailers are used primarily for temporary storage of DEA wastes. DEA acts as the generator when the waste is sent off-site for incineration.

- S02 - Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through ST 6 tanks.
- T01 - Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.
- T04 - Treatment in containers. Treatment in containers is not occurring at this time.

NOTE #2 - Aisle space was not provided for the drums in one of the trailers. According to Paul Zajec, inspections are not conducted of the inside of the storage trailers. HES considers the trailer itself a container therefore only the outside of the trailer is inspected for leaks. Wet oil dry was observed inside the trailer. According to Mr. Zajec the wet spot was probably due to rain entering the trailer through leakage.

APPARENT VIOLATIONS

- 725.115a - The inside of the container storage trailers are not being inspected.
- 725.115b - The container storage trailers are not included in the inspection schedule.
- 725.135 - Inadequate aisle space inside a container storage trailer.
- 725.274 - Containers in the trailers are not inspected weekly.
- 726.134c - Marketer of hazardous waste fuel is out of compliance with 725 subparts B, C and I.

CAG:bh:4259B

There were no apparent LHWB AND VIOLATIONS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: PETROCHEM SERVICES INCORPORATEDU.S. EPA I.D. No.: [REDACTED] / Site # 031620007Street: NE CANAL BANK ROADCity: LEMONT State: ILLINOIS Zip Code: 60439Telephone: [REDACTED]Operator: PETROCHEM SERVICES INCORPORATEDStreet: NE CANAL BANK ROADCity: LEMONT State: ILLINOIS Zip Code: 60439Telephone: 312/739-1150Owner: METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGOStreet: 100 EAST ERIE STREETCity: CHICAGO State: ILLINOIS Zip Code: 60611Telephone: 312/751-5600Inspection Date: [REDACTED] Time: 9:00 AM - 4:00 PM Weather Conditions: CLOUDY, 70°F

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>TODD MARVEL</u>	<u>IEPA</u>	<u>312/345-9780</u>

Facility Representatives: MICHAEL CRAFTON 312/739-1150

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u>✓</u>	<u>✓</u>	<u> </u>
Transporter	<u>✓</u>	<u>✓</u>	<u> </u>
Treater	<u>✓</u>	<u>✓</u>	<u> </u>
Storer	<u>✓</u>	<u>✓</u>	<u> </u>
Disposer	<u> </u>	<u> </u>	<u> </u>

SUMMARY

0311620007
09/30/88

Petrochem Services, Inc. is a service contracting company specializing in oil and chemical industry cleaning, maintenance and emergency spill response. This facility receives hazardous and non-hazardous wastes from off site and blends and treats these wastes to produce hazardous waste fuel, off-specification used oil and on-specification used oil. (Little to no on-spec used oil is generated.) Sources of waste generated off site include cleaning tanker trucks and cleaning off site stationary tanks. This facility also operates an on site barge cleaning operation. They receive hazardous and non-hazardous wastes from IEPA (ERU)/DCI activities (spills, abandoned drums, etc.), Tox-Away (a government-sponsored Indianapolis, IN. project to handle the shipment and disposal of hazardous household wastes) and generators, for temporary storage, which are eventually going off site for incineration.

HAZARDOUS WASTES GENERATED (RESTRICTED)

Hazardous Waste Fuel - D001, F003, F005

- Generated by blending and treating hazardous and non-hazardous waste
- Rate of generation: 45,000 gallons per month
- Shipped off site approximately 3 times per week to Continental Cement (Hanibal, MO.) or Systech (Greencastle, IN.) for use as fuel in cement kilns
- Stored in tanks

APPARENT DEFICIENCY NOTED:

Containers of restricted hazardous waste are not marked to identify the date they entered storage.

**RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	_____	✓	✓	_____	✓
2. F002	_____	✓	✓	_____	✓
3. F003	✓	✓	✓	_____	✓
4. F004	_____	✓	✓	_____	✓
5. F005	✓	✓	✓	_____	✓

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes NO CALIFORNIA LIST WASTES HANDLED AT THIS FACILITY.

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *No CALIFORNIA LIST WASTES HANDLED.*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis**1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: LAB ANALYSIS IS PERFORMED (w/o TCLP)

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: HAZARDOUS WASTE FUEL

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

ON SITE LAB TESTS INCOMING LOADS AND PERFORMS BLENDING CALCULATIONS TO DETERMINE RESULTING CONCENTRATIONS IN FINAL PRODUCT

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☒ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: CONTINENTAL CEMENT
(HARTZBURG, MO.) AND SYSTECH (GREENCASTLE, IN.)

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

GEN

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets treatment standards	_____ Yes	_____ No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

_____ Yes _____ No ☒ NA NOT SUBJECT TO THESE

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes ☒ No

If yes, list types of waste treatment units and processes:

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☒ Yes ☐ No

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

☐ Yes ☒ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☒ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? DATE UNKNOWN

- b. Are analyses conducted on-site or off-site?

☒ On-site ☒ Off-site

Identify off-site lab: EMS LABORATORIES (DARIEN, IL.)

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Describe the frequency of sampling: EACH SHIPMENT

- e. Describe procedures used to identify manifest discrepancies:

FINGERPRINT ANALYSIS AND VISUAL COMPARISON
WITH PREACCEPTANCE ANALYSIS AND PHYSICAL DATA

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☐ Yes ☒ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

DATES ENTERING STORAGE ARE NOT MARKED ON CON-
TAINERS

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☐ Yes ☒ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No

If yes, state how: _____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes ☐ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes ☐ No ☐ NA

RECORDED IN OPERATING RECORD

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

☒ Yes ☐ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

FUEL BLENDING TO PRODUCE HAZARDOUS WASTE FUEL

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

☐ Yes ☒ No ASSUMED TO EXCEED TREATMENT STANDARDS

4. Describe frequency of testing treatment residuals:

BLENDING CALCULATIONS FROM INFORMATION OBTAINED FROM RECEIVING ANALYSIS ARE PERFORMED FOR EVERY SHIPMENT SENT OFF SITE

5. Is dilution used as a substitute for treatment?

☐ Yes ☒ No

6. Are notifications prepared by the generators kept in the facility's operating record? ☒ Yes ☐ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☒ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: _____

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? ☐ Yes ☒ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

☐ Yes ☐ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment? ☐ Yes ☐ No

- d. Are residues treated prior to disposal?

☐ Yes ☐ No

If yes, are waste residues treated on-site or off-site?

☐ On-site ☐ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

☐ Yes ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

☐ Yes ☐ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

☐ Yes ☐ No

If yes, at what frequency? _____

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Petrochem Services Inc.

U.S. EPA I.D. No.: [REDACTED]

Street: NE Canal Bank Road

City: Lemont State: IL Zip Code: 60439

Telephone: 312/739-1150

Operator: Petrochem Services Inc.

Street: NE Canal Bank Road

City: Lemont State: IL Zip Code: 60439

Telephone: 312/739-1150

Owner: Metropolitan Sanitary District

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: [REDACTED] - [REDACTED] Weather Conditions: 80°, Sunny

	Name	Affiliation	Telephone
Inspectors:	John Maher	IEPA	312/345-9780

Facility Representatives:	Name	Telephone
	Jack Bogner	312/739-1150
	Paul Zajec	312/739-1150
	Stephen Hansen	312/241-9406

	RCRA Status	F-Solvent	LDR Status California List
Generator	<u>X</u>	<u>X</u>	
Transporter	<u>X</u>	<u>X</u>	
Treater	<u>X</u>	<u>X</u>	
Storer	<u>X</u>	<u>X</u>	
Disposer			

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OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

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INSPECTION SUMMARY

The land restricted wastes received at this site typically are incorporated into hazardous waste fuel. Some is ~~not~~ stored temporarily and then shipped off site for incineration.

The following apparent violations were observed at the time of the inspection:

- 1) Dates entering storage are not marked on containers of restricted waste.
- 2) Operating record does not indicate the quantity of restricted waste at each container storage area.

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *N/A X No California List Wastes*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

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B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes No NA

How was this determination made?

- Knowledge of waste

X Yes No

If yes, note how this is adequate: Lab analysis is performed, but not TCLP.

- TCLP

 Yes X No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes No NA

If yes, specify the waste stream: Hazardous Waste Fuel

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

 Yes No X NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

On site Lab tests the incoming loads and does blending calculations to determine resulting concentrations in the final product.

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2. California List Wastes

AUG 12 1988

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9091) as described by SW-846?

IEPA-DLPC

 Yes No

X NA No Calif. List wastes.

GEN

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

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Revised 11-03-87

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

X Yes No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X Yes No

If yes, does notification contain the following?

EPA Hazardous waste number(s) X Yes No

Applicable treatment standards X Yes No

Manifest number X Yes No

Waste analysis data, if available X Yes No

Identify off-site treatment or storage facilities: Continental
Cement in Hannibal, MO.

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

 Yes X No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

 Yes No

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GEN

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No

Not subject to these.
☒ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:

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TRANS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☒ Yes ☐ No

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

☐ Yes ☒ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☒ No

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? Date not known ✓

- b. Are analyses conducted on-site or off-site?

☒ On-site ☐ Off-site

Identify off-site lab: _____

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Describe the frequency of sampling: Every shipment.

- e. Describe procedures used to identify manifest discrepancies:

Finger print analysis and visual comparison with
preacceptance analysis and physical data.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☐ Yes ☒ No ✓

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B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

X Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

 Yes X No NA

Dates entering storage are not indicated.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

 Yes X No

5. Do operating records agree with container labeling?

X Yes No NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

 Yes X No NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

 Yes No

If yes, state how: _____

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7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

X Yes ___ No ___ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

X Yes ___ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

X Yes ___ No ___ NA

Recorded in operating record.

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

X Yes ___ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

Blending to produce hazardous waste fuel.

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

___ Yes X No It is assumed to exceed treatment standards.

4. Describe frequency of testing treatment residuals:

Blending calculations from information obtained from receiving analysis are performed for every shipment sent off site.

5. Is dilution used as a substitute for treatment?

___ Yes X No

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6. Are notifications prepared by the generators kept in the facility's operating record? ☒ Yes ☐ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☒ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: _____

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? ☐ Yes ☒ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

☐ Yes ☐ No

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Revised 11-03-87

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

TSD

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

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TSD

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

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Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
Continental Cement Hanibal, MO MOD054018288	Cement Kiln	F001 F002 F003 F005	45,000 gallons per month	Shipped three times a week.

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RCRA Checklist for Inspection of Hazardous Waste Fuel Marketers/Processors:

Name of Facility: Petrochem Services, Inc.

Address: Canal Bank Road, NE

Lemont, IL 60439

EPA Waste Fuel I.D. Number: [REDACTED]

Facility Inspection Representative: Mr. Jack Bogner

Title: Plant Manager

Telephone: (312) 739-1150

*Specify NA if questions do not apply.

Site Characterization:	yes	no	comments:
1. Does the facility accept hazardous waste?	<u>x</u>	<u> </u>	<u> </u>
2. Does the facility blend hazardous waste with used oil to be marketed as fuel?	<u>x</u>	<u> </u>	<u>sold as hazardous waste fuel</u>
3. Does the facility accept hazardous waste fuel, i.e., used oil previously blended with hazardous waste?	<u> </u>	<u>x</u>	<u>deal directly with generators; own collection trucks</u>
4. Does the facility only accept characteristic hazardous waste?	<u> </u>	<u>x</u>	<u>F1, 2, 3, 5 blended to hazardous waste fuel</u> <u>(F wastes are a majority</u>
<u>Used oil burned for energy recovery that is hazardous solely because it exhibits a characteristic of hazardous waste is subject to regulations under Subpart E rather than Subpart D. Refer to the Used Oil Fuel Marketer Checklist. (§266.30.(b)(1))</u>			
5. Does the facility only accept non-hazardous used oil? If so, refer to the Used Oil Fuel Marketer Checklist.	<u> </u>	<u>x</u>	<u> </u>
6. Does the facility generate hazardous waste? If so, refer to generator checklist.	<u>x</u>	<u> </u>	<u>residual sludges from paints, caustic sludge from barges (2 yrs. a</u>
7. Does the facility accept only used oil?	<u> </u>	<u> </u>	<u> </u>
8. Specify other material recycled as fuel.	<u> </u>	<u> </u>	<u> </u>

High Btu, low flash wastes from aerosol can shredder (hair spray, polishes) blended into hazardous waste fuel.

9. Check the following general operating practices:

Storage	Treatment	Disposal
<input checked="" type="checkbox"/> Drum	<input checked="" type="checkbox"/> Settling	<input type="checkbox"/> Landfill
<input checked="" type="checkbox"/> Above-ground tank(s)	<input checked="" type="checkbox"/> Heat addition in tank & external	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Underground tank(s)	<input checked="" type="checkbox"/> In-Line Filtering	<input type="checkbox"/> Surface Impoundment
<input checked="" type="checkbox"/> Other (roll offs not for HW)	<input type="checkbox"/> Cerifugation	
<input type="checkbox"/> Tank sizes	<input checked="" type="checkbox"/> Screen Filtration	<input type="checkbox"/> Other
<input type="checkbox"/> trailers	<input type="checkbox"/> Dehydration	
<input type="checkbox"/> aerosol cans 000174 non-haz	<input checked="" type="checkbox"/> Emulsion Breaking	
<input type="checkbox"/> aerosol cans 000173 D001	<input checked="" type="checkbox"/> Blending	

Descriptions and Observations: Capable of lime addition to sludge prior to plate and frame presses.
Neutralization prior to off-site.

10. Has the facility notified the U.S. EPA of their waste as fuel activities by January 29, 1986? (§266.34(b)) yes ☒ no ☐ comments: _____
- Specify Notification Information: _____
11. Has the facility submitted a Part A for storage of hazardous waste by May 29, 1986? (§266.34(c)) x ☒ ☐ see lengthy Part A
- Specify Part A information: _____
12. Does the facility accept hazardous waste? x ☒ ☐ _____
Specify waste and generator type.
(Request manifests for review)
- ☐ Small Quantity Generators
(☐ <100kg/m or ☐ 100 ≤1000 kg/m)
- ☐ Large Quantity Generators

Specify waste types: D001, F003, F005, F002, D002, etc. as on Part A.

- | | yes | no | comments: |
|--|---------------|---------------|---|
| 13. Does the facility have manifests for all shipments of hazardous waste and blended hazardous waste fuel received and sent? (§265.70) | <u>x</u> | <u> </u> | <u> </u> |
| 14. Does the facility comply with the prohibitions of §266.31(a)? Review operating records, certifications from burners and invoices. If available obtain a customer list from the facility. | <u>x</u> | <u> </u> | <u>Not available for inspection.</u> |
| 15. Does the facility have a copy of the <u>required</u> notice from burners or marketers to whom waste fuel is marketed? (§266.34(e)) | <u>x</u> | <u> </u> | <u>K-Five subsidiaries
Dupage Materials</u> |
| 16. Does the facility have invoice information or an operating record for shipments of used oil claimed to be specification used oil fuel? (§266.43(b)(6)) | <u> </u> | <u> </u> | <u>Have not shipped used
oil fuel since 7/87.</u> |
| 17. Does the facility analyze for metals, halogens and flash point? (§266.43(b)(1)) | <u>x</u> | <u> </u> | <u>See comments section.</u> |

Specify methods:

- | | | | |
|---|----------|---------------|--------------------------------------|
| 18. Does the facility have the records required under §266.34(f) i.e. copies of certifications from burners and other marketers | <u>x</u> | <u> </u> | <u>Not available for inspection.</u> |
|---|----------|---------------|--------------------------------------|

Note: If a facility markets hazardous waste fuel, the facility is subject to storage requirements of Parts 262, 264 or 265 and 270, Subparts A through L. Therefore, the RCRA checklist for inspection of TSD Facilities may be useful.

Inspectors's Name: Shirlee Brauer, Sue Rodenbeck, Dave Tompten

Title: Environmental Engineer, Environmental Scientist, Headquarters

Agency: U.S. EPA

Office Location: 230 S. Dearborn, Chgo., IL 60604

Date of Inspection: March 29, 1988

Comments:

A total halogenated organic compounds (TOX) analysis is completed on the first and fourth shipments.

Arsenic, sulfides, water, BS&W, pH, and API gravity tests are completed pre-shipment.

Once the waste is received, a fingerprint and PCB analysis is completed. The waste is held in the vertical tanks labeled 'VRT' on the plan until these analyses are complete.

Petrochem accepts crankcase oil from Midas Muffler, tank cleaning wastes, wastes from product tank spills, and spills from pollution control devices (oil/water separators).

Mr. Bogner, the plant manager, says they accept PCBs < 10 ppm for blending. He acknowledges that these fuels cannot be burned except in TSCA approved facilities.

Call Jay Longenecker of HES for notice from Petrochem to HES: (317) 243-0811.

RCRA Checklist for Inspection of Used Oil Fuel Marketers/Processors:Name of Facility: Petrochem Services, Inc., Chicago DivisionAddress: P.O. Box 337
Lemont, IL 60439EPA Waste Fuel I.D. Number: ILD-085-349-264Facility Inspection Representative: Mr. Jack BognerTitle: Plant ManagerTelephone: (312) 739-1150

Note: Petrochem has not sold used oil fuel since July, 1986. Petrochem has blended used oil fuel in hazardous waste fuel and has sent it to HES for marketing.

*Specify NA if questions do not apply.Applicability

Regulations of 40 CFR Part 266, Subpart E apply to used oil burned for energy recovery in boilers or industrial furnaces. Used oil includes any fuel produced from used oil by processing, blending, or other treatment. (266.40(a))

- | | yes | no | comments: |
|--|---------------|---------------|---|
| 1. Does the facility accept hazardous waste? | <u>X</u> | <u> </u> | <u> </u> |
| 2. Does the used oil contain > 1000 ppm of total halogens? If so, it is presumed to have been mixed with listed halogenated hazardous waste. (266.40(c)) | <u> </u> | <u> </u> | cannot tell by operating record
<u> </u>
accepts listed also |
| 3. Does the facility accept only characteristic hazardous waste? (list codes) (266.40(d)) | <u> </u> | <u>X</u> | <u> </u> |
| 4. Does the facility only accept used oil? List generators or other sources: | <u> </u> | <u>X</u> | <u> </u> |
| <u> </u> | | | |
| <u> </u> | | | |

5. Are other materials recycled for energy recovery? X

6. Check the following applicable operating practices:

Storage

Treatment

Disposal

X DrumX Settling LandfillX Above-ground tank(s)X Heat addition Land Treatment Underground tank(s)X In-Line Filtering Surface
Impoundment

X Other roll offs, not used for HW

 Cerifugation

Tank sized

X Screen Filtration

 Other

trailers

Dehydration

aerosol cans

~~X~~ Emulsion Breaking

X Blending

Descriptions and Observations:

- [illegible]

X

Specify Notification Information:

- X

see lengthy Part A

Specify Part A information:

- X

- X

- X

12. Do invoices contain the following information (§266.43(b)(5));

- X

10

Only buy from HES.
Only send to HES.

X

X

X

	yes	no	comments:
(v) Date of shipment or delivery; and	<u>x</u>	<u> </u>	<u> </u>
(vi) Statement - "This used oil is subject to EPA regulation under 40 CFR Part 266"	<u>x</u>	<u> </u>	<u> </u>
13. Does the facility have copies of invoices received and sent for the past three years? (§266.43(b)(6))	<u>x</u>	<u> </u>	<u>have not thrown any out</u>
14. Does the facility have copies of required notices from burners and other marketers, received and sent? (§266.43(b)(5))	<u> </u>	<u> </u>	<u>Not available for inspection.</u>
15. Does the facility first claim the used oil meet the specifications?	<u> </u>	<u>x</u>	<u> </u>
16. Does the facility have records of analyses or other information used to claim the used oil meets the specifications? (§266.43(b)(1))	<u> </u>	<u> </u>	<u>NA</u>
17. Does the facility have a record or operating log specifying for <u>each</u> shipment; (§266.43(b)(6)(i))			
A. Name and address of receiving facility;	<u> </u>	<u> </u>	<u>NA</u>
B. Quantity of used oil fuel delivered;	<u> </u>	<u> </u>	<u> </u>
C. Date of delivery or shipment;	<u> </u>	<u> </u>	<u> </u>
D. Cross-reference to records of used oil analyses or other information?	<u> </u>	<u> </u>	<u> </u>

Inspectors' Name: Shirlee Brauer, Sue Rodenbeck, Dave Tompten
Title: Environmental Engineer, Environmental Scientist, Headquarters
Agency: U. S. EPA
Office Location: 230 S. Dearborn St., Chicago, IL 60604
Date of Inspection: March 29, 1988

Comments:

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Petrochem Service Inc.
(B) Street: ONE STEPHEN ST.
(C) City: LEMONT (D) State: ILL. (E) Zip Code: 60434
(F) Phone: 312/257-5875 (G) County: COOK
(H) Operator: (SAME)
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: (SAME)
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____
(V) Date of Inspection: (W) Time of Inspection (From) 9:15 am (To) 11:30 am
(X) Weather Conditions: 55° Sunny

(Y) Person(s) Interviewed

Title

Telephone

MARION D. CASE

MANAGER Tech Ser.

312/257-5875

(Z) Inspection Participants

Agency/Title

Telephone

BRAD Benning

IEPA/Env. Sp.

345-9780

(AA) Preparer Information

Name

Agency/Title

Telephone

BRAD Benning

IEPA/Env. Sp.

345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- ☒ A. Storage and/or Treatment
1. Containers (I) ✓
 2. Tanks (J) ✓
 3. Surface Impoundments (K)
 4. Waste Piles (L)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

☐ D. Incineration and/or Thermal Treatment
(O and P)

☒ E. Chemical, Physical, and Biological
Treatment (Q)

OMITTED PAGES 11-17, 21

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDARDS
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	✓	—	
2. Facility expansion?	—	✓	—	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	<i>Supplied by generator or will send out analysis to Lab.</i>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	<i>HAVE very general plan, due to nature of business.</i>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	—	✓	—	
2. Artificial or natural barrier around facility?	✓	—	—	<i>FENCE</i>
3. Controlled entry?	✓	—	—	<i>Gates.</i>
4. Danger sign(s) at entrance?	—	✓	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	✓	—	<i>FACILITY HAS</i>
2. Records of operator error?	—	✓	—	<i>Rough drafts</i>
3. Records of discharges?	—	✓	—	<i>READY, Final</i>

Not Inspected

III GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Form 1 still
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	need revision.
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Supervisors and
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lead people have
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	been to Safety Seminars.
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Company Safety
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manual, given to
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	all employees.
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Monthly Safety & Training meeting.
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ON-JOB TRAINING
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— ☒ —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

☒ — —

SMALL AREA, VISUAL
OBSERVANCE.

2. Telephone or 2-way radios
at the scene of operations?

☒ — —

RADIOS - TELEPHONES

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ — —

Extinguishers - portable
wheel carts.
Numerous spill equip.

Indicate the volume of water and/or foam available for fire control:

Unlimited supply from canal - Small amount
of foam on-site

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ — —

In-house inspection
and annual inspection
of fire equip. plus
monthly inspections.

2. Is emergency equipment
maintained in operable
conditions?

☒ — —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

☒ — —

Not Inspected

(E) Is there adequate aisle space for unobstructed movement?



V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).)

— ✓ —

FINAL PLAN NOT

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

— ✓ —

Drafted. FACILITY IS IN the Emug. Response business and IS CAPABLE

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

— ✓ —

of handling spills. Facility cannot predict what

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— ✓ —

types of waste it may encounter. Facility does work

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— ✓ —

with local FIRE Depts. very closely. Usually FIRE Dept. Calls them for assistance.

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>No Emergencies AT FACILITY</u>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

VI. RECORDKEEPING - Continue

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓ _____

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓ _____

- c. The location and quantity of each hazardous waste within the facility?

✓ _____

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

_____ ✓ _____ No Disposal

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ _____

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

✓ _____

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

_____ ✓ _____

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

Yes No NI* Remarks

(A) Closure and Post Closure

- | | | | | |
|---|---|---|---|-------------------------------|
| 1. Is the facility closure plan available for inspection by May 19, 1981? | — | ✓ | — | _____ |
| 2. Has this plan been submitted to the Regional Administrator | — | ✓ | — | <u>Closure not Anticipate</u> |
| 3. Has closure begun? | — | ✓ | — | _____ |
| 4. Is closure estimate available by May 19, 1981? | — | ✓ | — | _____ |

(B) Post closure care and use of property

Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)

— — ✓ N/A

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Petro-Chem Date of Inspection: 10-27-81

Yes No NI* Remarks

- | | | | | |
|---|---|---|---|---------------------|
| 1. Are containers in good condition? | ✓ | — | — | _____ |
| 2. Are containers compatible with waste in them? | ✓ | — | — | _____ |
| 3. Are containers stored closed? | ✓ | — | — | _____ |
| 4. Are containers managed to prevent leaks? | ✓ | — | — | <u>Daily checks</u> |
| 5. Are containers inspected weekly for leaks and defects? | ✓ | — | — | _____ |
| 6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.) | ✓ | — | — | <u>(Ignitable)</u> |

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

J
TANKS

Facility Name: Petro-Chem

Date of Inspection: 10-27-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>No Tank storage as of this inspection.</u>
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>But are using Tank Trailers for storage while tank farm is being finished.</u>
3. Do continuous feed systems have a waste-feed cutoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>No open tanks</u>
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>No open tanks</u>
5. Are required daily and weekly inspections done?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>No Continuous feed</u>
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Separate tanks designated for different wastes. Protected in tank</u>
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A No answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others		
0 to 100.....	204 m	670	ft
101 to 1,000.....	380 m	1,250	ft
1,001 to 10,000.....	530 m	1,730	ft
10,001 to 30,000.....	690 m	2,260	ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: Petro-Chem.

Date of Inspection: 10-27-81

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	✓	—	<i>Not continuous feed.</i>

*Not Inspected

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
B. Are signed completed manifest(s) on file?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Petro-Chem Services Inc. is in the business of cleaning out barges and tanks for various industries. They will pump out remaining material for eventual reuse, and then wash out the tank or barge. They also are capable of responding to spills, and have the equip. for handling spills to the water and land. Their notification under RCRA was for the possibility that their cleaning solutions may at times be Hazardous, and due to the spill work, it is likely they will be handling Hazardous waste, and temp. storing it at their facility while permits are applied for proper disposal. At their facility they will also be able to due some treatment (Separation, Filtration, Neutralization).